



Pennsylvania
Gaming
Control
Board

**SLOT OPERATOR AND MANAGEMENT COMPANY-
APPLICATION AND DISCLOSURE INFORMATION
FORM**

Tower Entertainment, LLC

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INSTRUCTIONS

PENNSYLVANIA GAMING IS GOVERNED BY THE LAWS SET FORTH IN 4 PA.C.S. PART II, ENACTED BY THE ACT OF JULY 5, 2004 (P.L. 572, NO. 71), THE PENNSYLVANIA RACE HORSE DEVELOPMENT AND GAMING ACT (ACT), AS AMENDED, AND 58 PA. CODE PART VII, PENNSYLVANIA GAMING CONTROL BOARD (REGULATIONS).

THESE INSTRUCTIONS ARE APPLICABLE TO ANY "PERSON" SEEKING TO BE LICENSED AS A CONDITIONAL CATEGORY 1, CATEGORY 1, CATEGORY 2, CATEGORY 3 SLOT MACHINE OPERATOR (COLLECTIVELY REFERRED TO, HEREFTER AS SLOT OPERATOR) OR MANAGEMENT COMPANY. PLEASE BE ADVISED THAT NO PERSON, ITS AFFILIATE, INTERMEDIARY, SUBSIDIARY OR HOLDING COMPANY THAT HAS APPLIED FOR OR IS A HOLDER OF A SLOT MACHINE LICENSE, SHALL BE ELIGIBLE TO APPLY FOR OR HOLD A SUPPLIER OR MANUFACTURER LICENSE.

AS USED IN THESE INSTRUCTIONS, THE PHRASE "AFFILIATED ENTITIES" SHALL MEAN A SLOT OPERATOR'S OR MANAGEMENT COMPANY'S AFFILIATES, INTERMEDIARIES, SUBSIDIARIES AND HOLDING COMPANIES. SLOT MACHINE OPERATORS ARE SUBJECT TO THE REQUIREMENTS OF §§1302 AND 1303 (EXCLUSIVELY FOR CATEGORY 1), 1304 (EXCLUSIVELY FOR CATEGORY 2), 1305 (EXCLUSIVELY FOR CATEGORY 3) AND 1309 (ALL CATEGORIES) OF THE ACT. CONDITIONAL CATEGORY 1 SLOT MACHINE LICENSES ARE SUBJECT TO THE REQUIREMENTS OF §1315 OF THE ACT.

THE ORIGINAL FORM, ONE PAPER COPY, AND ONE (1) COMPACT DISC (CD) CONTAINING ALL FORMS MUST BE SENT TO THE PENNSYLVANIA GAMING CONTROL BOARD, BUREAU OF LICENSING, 303 WALNUT STREET, FIFTH FLOOR, VERIZON TOWER, HARRISBURG, PENNSYLVANIA 17101 WITH THE APPROPRIATE FEE. PLEASE REFER TO THE LICENSING SECTION OF THE BOARD'S WEBSITE FOR CD FORMATTING REQUIREMENTS.

1. SLOT OPERATOR AND MANAGEMENT COMPANY

THE FORMS THAT MAKE UP AN APPLICATION PACKAGE FOR A SLOT OPERATOR OR MANAGEMENT COMPANY LICENSE ARE AS FOLLOWS:

A. SLOT OPERATOR AND MANAGEMENT COMPANY APPLICATION AND DISCLOSURE INFORMATION FORM (TO BE COMPLETED BY APPLICANT AND EACH OF APPLICANT'S AFFILIATED ENTITIES).

B. REQUEST FOR USE OF ALTERNATIVE CONDITIONAL/CATEGORY 1 LICENSING STANDARDS FORM - ADDENDUM 1 (FOR CATEGORY 1 APPLICANTS SEEKING USE OF ALTERNATIVE LICENSING STANDARDS)

(COMPLETE THIS FORM IF YOU ARE A CONDITIONAL/CATEGORY 1 APPLICANT AND ARE REQUESTING THAT THE BOARD UTILIZE THE LICENSE APPLICATION PACKAGE FILED IN AND LICENSE ISSUED BY ANOTHER JURISDICTION PURSUANT TO §1314 OF THE ACT. IF THE BOARD DETERMINES THAT THE LICENSING STANDARDS OF THE OTHER JURISDICTION ARE COMPREHENSIVE AND THOROUGH AND PROVIDE SIMILAR ADEQUATE SAFEGUARDS TO THOSE IN THE ACT, ONLY UPDATED INFORMATION FROM THE DATE OF FILING THE APPLICATION IN THE OTHER JURISDICTION MAY BE NECESSARY. THE CONDITIONAL/CATEGORY 1 APPLICANT MAY BE ASKED TO SUBMIT PROOF THAT THE LICENSING STANDARDS OF THE OTHER JURISDICTION ARE COMPREHENSIVE AND THOROUGH AND PROVIDE SIMILAR ADEQUATE SAFEGUARDS).

C. MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (MULTI-JURISDICTIONAL PHD)

(TO BE COMPLETED BY EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE AS DEFINED IN 58 PA. CODE §401A.3) AND IDENTIFIED IN SCHEDULES 1, 5, 10, 10A, 11, 13, 15 AND 18).

D. PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (PA SUPPLEMENT)

(TO BE COMPLETED BY EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE IDENTIFIED IN SCHEDULES 1, 5, 10, 10A, 11, 13, 15 AND 18).

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E. PRINCIPAL ENTITY FORM

(TO BE COMPLETED BY EACH ENTITY THAT IS A PRINCIPAL IDENTIFIED IN SCHEDULES 10, 10A, 11, 13, 15 AND 18).

2. APPLICATION AND LICENSING FEES

A. APPLICATION FEES AND INVESTIGATION DEPOSITS

APPLICATION FEES MUST BE SUBMITTED WITH THE APPLICATION PACKAGE. THESE FEES ARE NON-REFUNDABLE DEPOSITS THAT WILL BE USED BY THE BOARD TO PROCESS AND INVESTIGATE THE SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT AND THE APPLICANT'S AFFILIATED ENTITIES AND PERSONS FILING FORMS AS PART OF THE APPLICATION PACKAGE. APPLICATION FEES MUST BE SUBMITTED FOR EACH APPLICANT, AFFILIATED ENTITY AND PERSON, UNLESS OTHERWISE NOTED.

THERE MAY BE ADDITIONAL COSTS AND EXPENSES INCURRED BY THE BOARD IN ITS PROCESSING AND INVESTIGATION OF THE SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT AND THE APPLICANT'S AFFILIATED ENTITIES AND PERSONS. THE SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT MUST REIMBURSE THE BOARD FOR ALL ADDITIONAL COSTS AND EXPENSES RELATED TO THE PROCESSING AND INVESTIGATION OF THEIR APPLICATION PACKAGE.

SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT	\$5,000.00
APPLICANT'S AFFILIATED ENTITIES	WAIVED
PRINCIPAL/KEY EMPLOYEES	\$2,500.00
PRINCIPAL ENTITY	\$2,500.00

B. LICENSING FEES

LICENSING FEES MUST BE PAID PRIOR TO ISSUANCE OF THE LICENSE.

CATEGORY 1 SLOT MACHINE LICENSE	\$50,000,000.00
CATEGORY 2 SLOT MACHINE LICENSE	\$50,000,000.00
CATEGORY 3 SLOT MACHINE LICENSE	\$5,000,000.00
CATEGORY 1 OR 2 MANAGEMENT COMPANY LICENSE.....	\$1,500,000/3 YEAR LICENSE
CATEGORY 3 MANAGEMENT COMPANY LICENSE.....	\$150,000/3 YEAR LICENSE

3. APPLICATION FORM INSTRUCTIONS

GENERALLY

AS USED IN THE SLOT OPERATOR OR MANAGEMENT COMPANY FORM, THE WORDS "APPLICANT" AND "YOU" SHALL MEAN THE SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT. WHEN APPLICANT'S AFFILIATED ENTITIES ARE COMPLETING THE FORM, "APPLICANT" AND "YOU" SHALL REFER TO THE AFFILIATED ENTITY COMPLETING THE FORM.

ALL ENTRIES ON THE FORM MUST BE TYPED OR PRINTED IN BLOCK LETTERING. INITIALS AND SIGNATURES MUST BE HANDWRITTEN BY THE PERSON PROVIDING THE INFORMATION. IF THE ANSWERS ARE NOT LEGIBLE, THE APPLICATION MAY NOT BE ACCEPTED.

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READ EACH QUESTION CAREFULLY PRIOR TO ANSWERING. ANSWER EVERY QUESTION COMPLETELY. DO NOT LEAVE BLANK SPACES. IF A QUESTION DOES NOT APPLY TO THE APPLICANT, WRITE "DOES NOT APPLY" IN RESPONSE TO THAT QUESTION. IF A SCHEDULE OR ADDENDUM DOES NOT APPLY TO THE APPLICANT, WRITE "DOES NOT APPLY" ON THE SCHEDULE OR ADDENDUM.

APPENDICES ARE TO BE PROVIDED BY THE APPLICANT. THE REQUIRED APPENDICES ARE LISTED ON THE APPLICATION CHECKLIST. APPENDICES MUST BE PRESENTED IN A TABBED MANNER. EACH TAB MUST INDICATE THE APPENDIX NUMBER. IMMEDIATELY FOLLOWING THE TAB, APPLICANT MUST INSERT A PAGE WITH THE APPENDIX NUMBER AND ALL INFORMATION APPLICABLE TO THE APPENDIX. IF AN APPENDIX DOES NOT APPLY TO THE APPLICANT, WRITE "DOES NOT APPLY" ON THE APPENDIX PAGE.

ALL PAGES OF THE FORM MUST BE INITIALED BY THE APPLICANT, OR IF THE APPLICANT IS NOT A NATURAL PERSON, THE PERSON AUTHORIZED TO COMPLETE THE FORM ON BEHALF OF THE APPLICANT MUST INITIAL EACH PAGE. IF ADDITIONAL PAGES ARE REQUIRED IN ORDER TO ANSWER ANY QUESTION, ADDITIONAL PAGES MAY BE UTILIZED AND MUST BE ATTACHED TO THE FORM. BE SURE TO INDICATE THE NUMBER(S) OF THE QUESTION(S) BEING ANSWERED AND INITIAL EACH ADDITIONAL PAGE. SOME SCHEDULES MAY REQUIRE DISCLOSURE OF INFORMATION FOR MORE THAN ONE NATURAL PERSON OR ENTITY OR TYPE OF INFORMATION. IF THERE ARE MULTIPLE DISCLOSURES, MAKE ENOUGH ADDITIONAL COPIES OF THE BLANK SCHEDULE AND COMPLETE IT FOR EACH NATURAL PERSON OR ENTITY OR TYPE OF INFORMATION.

ALL REQUIRED DOCUMENTATION, SUCH AS BUSINESS FORMATION PAPERS, TAX RETURNS AND APPENDICES, AS WELL AS THE APPLICATION FORMS THAT COMPRISE AN APPLICATION PACKAGE FOR A SLOT OPERATOR OR MANAGEMENT COMPANY LICENSE, AS LISTED ABOVE, MUST BE SUBMITTED AT THE TIME OF FILING THIS FORM. FURTHER, PURSUANT TO 58 PA. CODE §§421A.1(G) AND 423A.1(E), THE APPLICANT IS UNDER A CONTINUING DUTY TO PROMPTLY NOTIFY THE BOARD IF THERE IS A CHANGE IN THE INFORMATION PROVIDED TO THE BOARD.

ADDITIONAL FINANCIAL INFORMATION WILL BE REQUESTED AS NEEDED.

SHOULD YOU BE UNABLE TO UNDERSTAND THIS FORM FULLY IN ENGLISH, IT IS YOUR RESPONSIBILITY TO ACQUIRE ADEQUATE MEANS OF TRANSLATION. IF YOU SUBMIT A DOCUMENT TO THE BOARD THAT IS IN A LANGUAGE OTHER THAN ENGLISH, YOU MUST ALSO SUBMIT AN ENGLISH TRANSLATION COMPLIANT WITH 58 PA. CODE §423A.1(H).

ALL NOTICES REGARDING YOUR APPLICATION WILL BE SENT TO THE ADDRESS YOU PROVIDE ON THIS FORM. YOU MUST IMMEDIATELY NOTIFY THE BOARD IF YOU CHANGE YOUR ADDRESS.

FAILURE TO ANSWER ANY QUESTION COMPLETELY AND TRUTHFULLY WILL RESULT IN DENIAL OF YOUR APPLICATION AND/OR REVOCATION OF YOUR LICENSE, REGISTRATION, CERTIFICATE OR PERMIT AND MAY SUBJECT YOU TO CRIMINAL PENALTIES UNDER 18 PA.C. S. A. §4903.

ANY PERSON WHO APPLIES FOR AND OBTAINS A LICENSE, REGISTRATION, CERTIFICATE OR PERMIT FROM THE BOARD MAY BE REQUIRED TO SUBMIT TO WARRANTLESS SEARCHES WHEN PRESENT IN A LICENSED GAMING FACILITY PURSUANT TO THE ACT.

CONFIDENTIAL INFORMATION (AS DEFINED IN 58 PA. CODE §401A.3) SUPPLIED TO THE BOARD OR OTHERWISE OBTAINED SHALL NOT BE REVEALED EXCEPT IN THE COURSE OF THE NECESSARY ADMINISTRATION OF THE ACT, OR UPON THE LAWFUL ORDER OF A COURT OF COMPETENT JURISDICTION OR, WITH THE APPROVAL OF THE ATTORNEY GENERAL, TO A DULY AUTHORIZED LAW ENFORCEMENT AGENCY. AN APPLICANT OR LICENSE, REGISTRATION, CERTIFICATE OR PERMIT HOLDER WAIVES ANY LIABILITY OF THE COMMONWEALTH OF PENNSYLVANIA AND ITS INSTRUMENTALITIES AND AGENTS FOR ANY DAMAGES RESULTING FROM ANY DISCLOSURE OR PUBLICATION IN ANY MANNER, OTHER THAN A WILLFULLY UNLAWFUL DISCLOSURE OR PUBLICATION.

PURSUANT TO 58 PA. CODE §423A.5, ONCE THE APPLICATION HAS BEEN FILED, THE APPLICANT MAY ONLY WITHDRAW ITS APPLICATION BY FILING A PETITION WITH THE BOARD SEEKING PERMISSION TO WITHDRAW.

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A LICENSE, PERMIT, CERTIFICATION OR REGISTRATION ISSUANCE, RENEWAL OR OTHER AUTHORIZATION ISSUED BY THE BOARD IS A REVOCABLE PRIVILEGE. NO PERSON HOLDING A LICENSE, PERMIT, CERTIFICATION OR REGISTRATION, RENEWAL, OR OTHER AUTHORIZATION IS DEEMED TO HAVE ANY PROPERTY RIGHTS RELATED TO THE LICENSE, PERMIT, CERTIFICATION OR REGISTRATION.

AN APPLICATION THAT HAS BEEN ACCEPTED FOR FILING AND ALL RELATED MATERIALS SUBMITTED TO THE BOARD BECOME THE PROPERTY OF THE BOARD AND WILL NOT BE RETURNED TO THE APPLICANT.

THIS IS AN APPLICATION FOR A SLOT MACHINE OR MANAGEMENT COMPANY LICENSE. AN ENTITY INTERESTED IN OFFERING TABLE GAMES MUST FIRST OBTAIN A SLOT MACHINE LICENSE IN ORDER TO BE ELIGIBLE TO FILE A PETITION SEEKING AUTHORIZATION TO CONDUCT TABLE GAMES. ANY REFERENCES TO TABLE GAMES IN THIS APPLICATION ARE FOR INFORMATIONAL PURPOSES ONLY.

IF YOU HAVE ANY QUESTIONS REGARDING THE APPLICATION PACKAGE FORMS OR THE INFORMATION REQUIRED TO COMPLETE ANY APPLICATION, PLEASE CONTACT THE PENNSYLVANIA GAMING CONTROL BOARD - BUREAU OF LICENSING AT (717) 346-8300.

SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT	
INSERT THE NUMBER OF EACH OF THE FOLLOWING FORMS INCLUDED IN THIS APPLICATION PACKAGE:	
<input type="checkbox"/>	SLOT OPERATOR OR MANAGEMENT COMPANY DISCLOSURE INFORMATION FORM (FOR APPLICANT AND EACH OF APPLICANT'S AFFILIATED ENTITIES).
<input type="checkbox"/>	REQUEST FOR USE OF ALTERNATIVE CONDITIONAL/CATEGORY 1 LICENSING STANDARDS - ADDENDUM I (FOR CONDITIONAL/CATEGORY 1 APPLICANT REQUESTING THAT THE BOARD UTILIZE THE APPLICATION FILED IN AND LICENSE ISSUED BY ANOTHER JURISDICTION).
<input type="checkbox"/>	MULTI - JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (MULTI - JURISDICTIONAL PHD) (FOR EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE).
<input type="checkbox"/>	PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI - JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (PA SUPPLEMENT) (FOR EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE).
<input type="checkbox"/>	PRINCIPAL ENTITY FORM (FOR EACH ENTITY THAT IS A PRINCIPAL).

APPLICANT INFORMATION

APPLICANT'S BUSINESS NAME			
BUSINESS NAME AS IT APPEARS ON APPLICANT'S CERTIFICATE OF INCORPORATION, CHARTER, BYLAWS, PARTNERSHIP AGREEMENT OR OTHER OFFICIAL DOCUMENTS (SPELL OUT COMPLETE NAME. DO NOT USE ABBREVIATIONS)			
Tower Entertainment, LLC			
TRADE NAME(S) AND DOING BUSINESS AS ("DBA") NAMES			
Does not apply			
IS THE APPLICANT A MINORITY OR WOMEN'S BUSINESS ENTERPRISE THAT IS CERTIFIED BY THE BUREAU OF MINORITY AND WOMEN'S BUSINESS OPPORTUNITIES OF THE DEPARTMENT OF GENERAL SERVICES? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
IF YES, PROVIDE ENTERPRISE CERTIFICATION NUMBER. _____			
APPLICANT'S PRINCIPAL ADDRESS			
ADDRESS LINE 1			
2711 Centerville Road			
ADDRESS LINE 2			
Suite 400			
ADDRESS LINE 3			
CITY		STATE/PROVINCE	POSTAL CODE
Wilmington		Delaware	19808
COUNTRY		EMAIL ADDRESS	
USA			
COUNTY	TOWNSHIP	WEB URL	
PHONE NUMBER ()		FAX NUMBER ()	
215-467-4600			
APPLICANT'S ADDRESS IN PENNSYLVANIA (IF APPLICABLE)			
ADDRESS LINE 1			
1033 N. 2nd Street			
ADDRESS LINE 2			
Suite 2A			
ADDRESS LINE 3			
CITY		STATE/PROVINCE	POSTAL CODE
Philadelphia		PA	19123
COUNTRY		EMAIL ADDRESS	
USA			
COUNTY	TOWNSHIP	WEB URL	
Philadelphia			
PHONE NUMBER ()		FAX NUMBER ()	
215-467-4600			
CONTACT NAME FOR THIS APPLICATION			
FIRST NAME	MIDDLE NAME	LAST NAME	SUFFIX (JR., SR., ETC.)
Bart		Blatstein	
TITLE			
c/o Tina Roberts			
1. INDIVIDUAL E-MAIL ADDRESS			
PHONE NUMBER ()		FAX NUMBER ()	
APPLICANT'S FORM OF ORGANIZATION			
CHECK ONE			
<input type="checkbox"/> SOLE PROPRIETORSHIP	<input type="checkbox"/> PARTNERSHIP	<input type="checkbox"/> LIMITED PARTNERSHIP	<input type="checkbox"/> C-CORPORATION
<input type="checkbox"/> LIMITED LIABILITY COMPANY	<input type="checkbox"/> S-CORPORATION	<input type="checkbox"/> TRUST	
<input type="checkbox"/> OTHER (DESCRIBE) _____			

[Handwritten Signature]

APPLICANT'S ORGANIZATION DOCUMENTS		
STATE OF INCORPORATION, REGISTRATION OR OTHER TYPE OF FORMATION Delaware		DATE OF FORMATION Sept. 27, 2012
APPLICANT'S BUSINESS NAME AS IT APPEARS ON THE FORMATION DOCUMENTS Tower Entertainment, LLC		
LIST ALL STATES IN WHICH THE APPLICANT IS CURRENTLY REGISTERED OR AUTHORIZED TO DO BUSINESS Delaware, Pennsylvania		
COMPLETE <u>SCHEDULE 1</u> CONCERNING APPLICANT'S INCORPORATORS/FOUNDERS		
IS APPLICANT REGISTERED OR AUTHORIZED TO DO BUSINESS IN THE COMMONWEALTH OF PENNSYLVANIA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
APPLICANT'S IDENTIFICATION NUMBERS		
FEDERAL EMPLOYER IDENTIFICATION NUMBER/TIN	PA UNEMPLOYMENT COMPENSATION ACCOUNT NUMBER	
PA DEPARTMENT OF REVENUE CORPORATE BOX NUMBER	PA LIQUOR CONTROL BOARD LICENSE NUMBER Does not apply	
PA WORKERS COMPENSATION POLICY NUMBER	PA DEPARTMENT OF STATE - ENTITY NUMBER 4142985	
DOES THE APPLICANT HAVE ANY OUTSTANDING TAX LIABILITIES TO EITHER THE COMMONWEALTH OF PENNSYLVANIA OR ANY OTHER STATE, LOCALITY OR THE FEDERAL GOVERNMENT? IF YOU ANSWER YES, PROVIDE DETAILS CONCERNING ALL OUTSTANDING TAX LIABILITIES.		
APPLICANT'S BILLING CONTACT INFORMATION		
FIRST NAME Bart	LAST NAME Blatstein	SUFFIX (JR., SR., ETC.)
TITLE c/o Tina Roberts		INDIVIDUAL EMAIL ADDRESS
ADDRESS 1033 N. 2nd Street, Suite 2A		
CITY Philadelphia	STATE/PROVINCE Pennsylvania	POSTAL CODE 19123
PHONE NUMBER () 215-467-4600		FAX NUMBER ()
TYPE OF LICENSE APPLICANT IS SEEKING		
<input type="checkbox"/> CONDITIONAL CATEGORY 1 <input type="checkbox"/> CONDITIONAL CATEGORY 1 AFFILIATE <input type="checkbox"/> CATEGORY 1 <input type="checkbox"/> CATEGORY 1 AFFILIATE <input checked="" type="checkbox"/> CATEGORY 2 <input type="checkbox"/> CATEGORY 2 AFFILIATE <input type="checkbox"/> CATEGORY 3 <input type="checkbox"/> CATEGORY 3 AFFILIATE <input type="checkbox"/> MANAGEMENT COMPANY <input type="checkbox"/> MANAGEMENT COMPANY AFFILIATE		
CRIMINAL HISTORY		
THE NEXT SECTION ASKS ABOUT ANY OFFENSES OR CHARGES APPLICANT OR ANY OF ITS PRINCIPALS OR KEY EMPLOYEES MAY HAVE COMMITTED OR HAD FILED AGAINST THEM. PRIOR TO ANSWERING THIS QUESTION, CAREFULLY REVIEW THE DEFINITIONS AND INSTRUCTIONS THAT FOLLOW.		
DEFINITIONS	FOR PURPOSES OF THIS SECTION: A. "CRIME OR OFFENSE" INCLUDES ALL FELONIES AND MISDEMEANORS, AS WELL AS SUMMARY OFFENSES THAT MAY HAVE REQUIRED YOU TO APPEAR BEFORE A LAW ENFORCEMENT AGENCY, STATE OR FEDERAL GRAND JURY, JUSTICE COURT, MUNICIPAL COURT, CITY COURT, MILITARY COURT OR ANY OTHER COURT EXCEPT JUVENILE COURT. INCLUDE ALL DUI/DWI OFFENSES. B. "ARREST" INCLUDES ANY TIME THAT YOU WERE STOPPED BY A POLICE OFFICER OR OTHER LAW ENFORCEMENT OFFICER AND ADVISED THAT YOU WERE UNDER.	

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	<p>ARREST, DETAINED, HELD FOR QUESTIONING, REQUESTED BY A POLICE OFFICER OR LAW ENFORCEMENT OFFICER TO COME TO A POLICE STATION AND ANSWER QUESTIONS, TAKEN INTO CUSTODY BY ANY POLICE OFFICER OR OTHER LAW ENFORCEMENT OFFICER, FINGERPRINTED, HELD IN JAIL, OR INSTRUCTED TO APPEAR IN COURT OR SUBPOENAED TO ANSWER FOR CONDUCT WHICH IS A CRIME AS HAS BEEN DEFINED IN PARAGRAPH "A."</p> <p>C. "CHARGE" INCLUDES ANY INDICTMENT, COMPLAINT, INFORMATION, SUMMONS, CITATION OR OTHER NOTICE OF THE ALLEGED COMMISSION OF ANY CRIME OR OFFENSE AS DEFINED IN PARAGRAPH "A."</p>	
INSTRUCTIONS	<p>1. ANSWER "YES" AND PROVIDE ALL INFORMATION TO THE BEST OF YOUR ABILITY EVEN IF:</p> <ul style="list-style-type: none"> A. YOU DID NOT COMMIT THE OFFENSE CHARGED; B. THE ARREST OR CHARGES WERE DISMISSED OR THE CHARGES WERE SUBSEQUENTLY DOWNGRADED TO A LESSER CHARGE; C. YOU PLEADED NOT GUILTY OR NOLO CONTENDERE; D. YOU COMPLETED AN ACCELERATED REHABILITATIVE DISPOSITION ("ARD") OR EQUIVALENT DIVERSIONARY PROGRAM; E. THE CHARGES OR CONVICTION WERE EXPUNGED FROM YOUR RECORD, EVEN IF YOU HAVE EXPUNGEMENT PAPERS; F. YOU WERE NOT CONVICTED OR WERE FOUND "NOT GUILTY" G. YOU DID NOT SERVE ANY TIME IN PRISON OR JAIL; H. THE ARRESTS, CHARGES OR OFFENSES HAPPENED A LONG TIME AGO; I. YOU WERE ARRESTED OR CHARGED IN ANOTHER STATE (A STATE OTHER THAN PENNSYLVANIA); J. YOU WERE NEVER PHYSICALLY TAKEN INTO CUSTODY AND/OR TRANSPORTED TO A POLICE STATION OR JAIL. <p>2. ANSWER "NO" IF:</p> <ul style="list-style-type: none"> A. YOU HAVE NEVER BEEN ARRESTED OR CHARGED WITH ANY CRIME OR OFFENSE; B. YOUR ARREST HAPPENED WHEN YOU WERE UNDER 18 YEARS OF AGE AND YOUR COURT APPEARANCE WAS IN JUVENILE COURT. <p>FAILURE TO FULLY ANSWER THIS QUESTION MAY RESULT IN THE DENIAL OF YOUR APPLICATION.</p>	
<p>1. HAS APPLICANT OR ANY OF ITS PRINCIPALS OR KEY EMPLOYEES EVER BEEN INDICTED, CHARGED WITH OR CONVICTED OF A CRIMINAL OFFENSE OR BEEN A PARTY TO OR NAMED AS AN UNINDICTED CO-CONSPIRATOR IN ANY CRIMINAL PROCEEDING IN THE COMMONWEALTH OR ANY OTHER JURISDICTION?</p>		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<p>1. A. HAS APPLICANT OR ANY OF ITS PRINCIPALS OR KEY EMPLOYEES EVER BEEN CONVICTED OF A FELONY?</p>		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<p>1. B. HAS APPLICANT OR ANY OF ITS PRINCIPALS OR KEY EMPLOYEES EVER BEEN CONVICTED OF A MISDEMEANOR OR GAMBLING OFFENSE?</p> <p>IF YOU ANSWER YES TO ANY OF THESE QUESTIONS, YOU MUST COMPLETE SCHEDULE 23 CONCERNING CRIMINAL HISTORY.</p>		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Please see related schedule
<p>TESTIMONY, INVESTIGATIONS OR POLYGRAPHS</p>		
<p>2. HAS APPLICANT OR ANY OF ITS PRINCIPALS OR KEY EMPLOYEES EVER BEEN CALLED TO</p>		

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<p>TESTIFY BEFORE, BEEN THE SUBJECT OF AN INVESTIGATION CONDUCTED BY, OR REQUESTED TO TAKE A POLYGRAPH EXAM BY ANY GOVERNMENTAL AGENCY, COURT, COMMITTEE, GRAND JURY OR INVESTIGATORY BODY (MUNICIPAL, STATE, COUNTY, PROVINCIAL, FEDERAL, NATIONAL, ETC.) OTHER THAN IN RESPONSE TO MINOR TRAFFIC RELATED OFFENSES?</p> <p>IF YOU ANSWER YES, YOU MUST COMPLETE SCHEDULE 24 CONCERNING TESTIMONY, INVESTIGATIONS OR POLYGRAPHS.</p>	
ANTITRUST, TRADE REGULATION & SECURITIES JUDGMENTS; STATUTORY AND REGULATORY VIOLATIONS	
<p>3. HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES EVER HAD A JUDGMENT, ORDER, CONSENT DECREE OR CONSENT ORDER PERTAINING TO A VIOLATION OR ALLEGED VIOLATION OF THE FEDERAL ANTITRUST, TRADE REGULATION OR SECURITIES LAWS, OR SIMILAR LAWS OF ANY STATE, PROVINCE OR COUNTRY ENTERED AGAINST IT?</p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<p>4. IN THE PAST TEN (10) YEARS, HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES HAD A JUDGMENT, ORDER, CONSENT DECREE OR CONSENT ORDER PERTAINING TO ANY STATE OR FEDERAL STATUTE, REGULATION OR CODE THAT RESULTED IN A FINE OR PENALTY OF \$50,000 OR MORE ENTERED AGAINST IT?</p> <p>IF YOU ANSWER YES TO EITHER QUESTION, YOU MUST COMPLETE SCHEDULE 26 CONCERNING ANTITRUST, TRADE REGULATION & SECURITY JUDGMENTS; STATUTORY AND REGULATORY VIOLATIONS.</p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
BANKRUPTCY OR INSOLVENCY PROCEEDINGS	
<p>5. HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES HAD ANY PETITION UNDER ANY PROVISION OF THE FEDERAL BANKRUPTCY CODE OR UNDER ANY STATE INSOLVENCY LAW FILED BY OR AGAINST IT IN THE LAST TEN (10) YEAR PERIOD?</p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<p>6. HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES SOUGHT RELIEF UNDER ANY PROVISION OF THE FEDERAL BANKRUPTCY CODE OR UNDER ANY STATE INSOLVENCY LAW IN THE LAST TEN (10) YEAR PERIOD?</p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<p>7. HAS A COURT APPOINTED ANY RECEIVER, FISCAL AGENT, TRUSTEE, REORGANIZATION TRUSTEE, OR SIMILAR OFFICER FOR APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES IN THE LAST TEN (10) YEARS?</p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<p>IF YOU ANSWER YES TO ANY OF THESE QUESTIONS, YOU MUST COMPLETE SCHEDULE 27 CONCERNING BANKRUPTCY OR INSOLVENCY PROCEEDINGS.</p>	
APPLICANT'S LICENSES AND PERMITS	
<p>8. HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES APPLIED FOR ANY LICENSE OR PERMIT BY A GOVERNMENT AGENCY FOR THE COLLECTION OF SALES AND USE TAX, SELLING AND SERVING LIQUOR AND MALT BEVERAGES, PROVIDING OVERNIGHT LODGING SERVICES OR ANY OTHER ACTIVITY REQUIRING A LICENSE OR PERMIT? A GOVERNMENT AGENCY AS USED HERE INCLUDES ANY SUBORDINATE CREATURE OF FEDERAL, STATE, NATIVE AMERICAN OR LOCAL GOVERNMENT CREATED TO CARRY OUT A GOVERNMENTAL FUNCTION OR TO IMPLEMENT A STATUTE OR STATUTES.</p> <p>IF YOU ANSWER YES, YOU MUST COMPLETE SCHEDULE 28 CONCERNING NON-GAMING LICENSES AND PERMITS.</p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<p>9. HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES APPLIED FOR ANY LICENSE OR PERMIT BY A GOVERNMENT AGENCY CHARGED WITH REGULATING GAMES OF CHANCE, INCLUDING BUT NOT LIMITED TO SLOT MACHINES, VIDEO LOTTERY TERMINALS, TABLE GAMES, HORSE RACING, JAI ALAI, ETC.? A GOVERNMENT AGENCY AS USED HERE INCLUDES ANY FEDERAL, STATE, NATIVE AMERICAN OR LOCAL GOVERNMENT CREATED TO CARRY OUT A GOVERNMENTAL FUNCTION OR TO IMPLEMENT A STATUTE OR STATUTES.</p> <p>IF YOU ANSWER YES, YOU MUST COMPLETE <u>SCHEDULE 29</u> CONCERNING GAMING LICENSES AND PERMITS.</p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
APPLICANT'S CONTRIBUTIONS AND DISBURSEMENTS	
<p>10. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES, HOLDING COMPANIES, PRINCIPALS, EMPLOYEES OR ANY THIRD PARTIES ACTING FOR OR ON BEHALF OF APPLICANT MADE ANY BRIBES OR KICKBACKS OR MADE ANY PAYMENTS ALLEGED TO HAVE BEEN BRIBES OR KICKBACKS TO ANY EMPLOYEE, PERSON, COMPANY OR ORGANIZATION TO OBTAIN FAVORABLE TREATMENT?</p>	
<p>11. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES, HOLDING COMPANIES, PRINCIPALS, EMPLOYEES OR ANY THIRD PARTIES ACTING FOR OR ON BEHALF OF THE APPLICANT MADE ANY BRIBES OR KICKBACKS OR MADE ANY PAYMENTS ALLEGED TO HAVE BEEN BRIBES OR KICKBACKS TO ANY GOVERNMENT OFFICIAL, DOMESTIC OR FOREIGN TO OBTAIN FAVORABLE TREATMENT?</p>	
<p>12. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES, HOLDING COMPANIES, PRINCIPALS, EMPLOYEES OR ANY THIRD PARTIES FOR OR ON BEHALF OF APPLICANT LOANED FUNDS FOR THE PURPOSE OF OPPOSING OR SUPPORTING ANY GOVERNMENT, POLITICAL PARTY, CANDIDATE OR COMMITTEE, EITHER DOMESTIC OR FOREIGN?</p>	
<p>13. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES, HOLDING COMPANIES, PRINCIPALS, EMPLOYEES OR ANY THIRD PARTIES ACTING FOR OR ON BEHALF OF APPLICANT DONATED OR LOANED PROPERTY OR ANY OTHER THING OF VALUE, OR ORGANIZED, SPONSORED OR PARTICIPATED IN FUNDRAISING ACTIVITIES FOR THE PURPOSE OF OPPOSING OR SUPPORTING ANY GOVERNMENT, POLITICAL PARTY, CANDIDATE OR COMMITTEE, EITHER DOMESTIC OR FOREIGN?</p>	
<p>14A. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES MADE ANY LOANS, DONATIONS OR OTHER DISBURSEMENTS TO PRINCIPALS, EMPLOYEES OR ANY THIRD PARTIES FOR THE PURPOSE OF REIMBURSING SUCH INDIVIDUALS FOR POLITICAL CONTRIBUTIONS EITHER FOREIGN OR DOMESTIC?</p> <p>14B. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES FORMED OR CAUSED TO BE FORMED, A POLITICAL ACTION COMMITTEE EITHER UNDER FEDERAL OR STATE ELECTION LAWS?</p> <p>14C. AS A RESULT OF THE CITIZEN'S UNITED V. FEC DECISION, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES MADE "INDEPENDENT EXPENDITURES", AS DEFINED IN SEC. 1621(e) OF THE PENNSYLVANIA ELECTION CODE, FOR THE PURPOSE OF INFLUENCING AN ELECTION COVERED BY THE PENNSYLVANIA ELECTION CODE?</p>	

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15. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES MAINTAINED ANY BANK ACCOUNT, DOMESTIC OR FOREIGN, NOT REFLECTED ON THE APPLICANT'S BOOKS OR RECORDS?	
16. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES MAINTAINED ANY NUMBERED ACCOUNT OR ANY ACCOUNT IN THE NAME OF A NOMINEE FOR APPLICANT?	
IF YOU ANSWER YES TO ANY OF THESE QUESTIONS, YOU MUST COMPLETE <u>SCHEDULE 30</u> , CONCERNING CONTRIBUTIONS AND DISBURSEMENTS.	

APPLICATION CHECKLIST

PLACE A CHECKMARK IN THE BOX NEXT TO EACH ITEM APPLICANT HAS ATTACHED TO THIS APPLICATION AND DISCLOSURE INFORMATION FORM.		
EACH ITEM MARKED AS MANDATORY MUST BE COMPLETED AND SUBMITTED AS PART OF THIS APPLICATION FORM. IF ANY ITEM IS MISSING, THE APPLICATION WILL BE CONSIDERED INCOMPLETE AND WILL NOT BE PROCESSED. IF A QUESTION, SCHEDULE OR ADDENDUM DOES NOT APPLY TO THE APPLICANT, YOU MUST WRITE "DOES NOT APPLY" IN EACH FIELD OF THE QUESTION, SCHEDULE OR ADDENDUM.		
<input checked="" type="checkbox"/>	SCHEDULE 1: INCORPORATORS/FOUNDERS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 2: OTHER NAMES USED BY APPLICANT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 3: ADDRESSES CURRENTLY USED BY APPLICANT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 4: ADDRESSES USED BY APPLICANT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 5: CURRENT OFFICERS, DIRECTORS/PARTNERS AND TRUSTEES	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 6: FORMER (NO LONGER ACTIVE) OFFICERS, DIRECTORS/PARTNERS AND TRUSTEES	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 7: EMPLOYEES EARNING OVER \$250,000 IN ANNUAL COMPENSATION FROM APPLICANT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 8: BONUS, PROFIT SHARING, PENSION RETIREMENT, DEFERRED COMPENSATION & SIMILAR PLANS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 9: STOCK DESCRIPTION (FOR C CORPORATIONS, S-CORPORATIONS, LLCs)	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 10: VOTING SHAREHOLDERS (FOR C CORPORATIONS, S-CORPORATIONS, LLCs)	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 10A: INTEREST OF CURRENT PARTNERS (FOR PARTNERSHIPS, LLPs, LIMITED PARTNERSHIPS, LLCs)	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 10B: INTEREST OF FORMER PARTNERS (FOR PARTNERSHIPS, LLPs, LIMITED PARTNERSHIPS, LLCs)	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 11: NON-VOTING SHAREHOLDERS (FOR C CORPORATIONS, S-CORPORATIONS, LLCs)	MANDATORY

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<input checked="" type="checkbox"/>	SCHEDULE 12: LONG TERM DEBT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 13: HOLDERS OF LONG TERM DEBT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 14: OTHER INDEBTEDNESS AND SECURITY DEVICES	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 15: HOLDER OF OTHER INDEBTEDNESS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 16: SECURITIES OPTIONS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 17: BENEFICIAL OWNER OF OPTIONS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 18: OTHER PRINCIPALS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 19: FINANCIAL INSTITUTIONS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 20: CONTRACTS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 21: STOCK HELD BY APPLICANT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 22: INSIDER TRANSACTIONS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 23: CRIMINAL HISTORY	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 24: TESTIMONY, INVESTIGATIONS OR POLYGRAPHS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 25: EXISTING LITIGATION	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 26: ANTITRUST, TRADE REGULATION AND SECURITY JUDGMENTS; STATUTORY AND REGULATORY VIOLATIONS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 27: BANKRUPTCY OR INSOLVENCY PROCEEDINGS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 28: NON-GAMING LICENSES AND PERMITS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 29: GAMING LICENSES AND PERMITS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 30: APPLICANT'S CONTRIBUTIONS AND DISBURSEMENTS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 31: APPLICANT BACKGROUND PART 1	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 32: APPLICANT BACKGROUND PART 2	MANDATORY
<input checked="" type="checkbox"/>	APPLICATION FOR PENNSYLVANIA TAX CLEARANCE REVIEW	MANDATORY
<input checked="" type="checkbox"/>	AFFIDAVIT	MANDATORY
<input checked="" type="checkbox"/>	RELEASE AUTHORIZATION	MANDATORY
<input checked="" type="checkbox"/>	WAIVER OF LIABILITY	MANDATORY
<input checked="" type="checkbox"/>	DIVERSITY PLAN STATEMENT	MANDATORY
<input type="checkbox"/>	CONDITIONAL/CATEGORY 1 APPLICANT'S AFFIRMATION DOES NOT APPLY	CATEGORY 1 APPLICANT ONLY

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<input type="checkbox"/>	ADDENDUM 1 – REQUEST FOR USE OF ALTERNATIVE CATEGORY 1 SLOT MACHINE LICENSING STANDARDS FORM DOES NOT APPLY	CATEGORY 1 APPLICANT ONLY
<input type="checkbox"/>	ALTERNATIVE LICENSING AFFIDAVIT DOES NOT APPLY	OPTIONAL CATEGORY 1 APPLICANT ONLY
<input checked="" type="checkbox"/>	LICENSED ENTITY REPRESENTATIVE REGISTRATION	MANDATORY
<input checked="" type="checkbox"/>	ANNUAL CERTIFICATION TO PREVENT VIOLATIONS OF SECTION 1513 FORM	MANDATORY
<input checked="" type="checkbox"/>	PENNSYLVANIA POLITICAL CONTRIBUTIONS FORM	MANDATORY
<input checked="" type="checkbox"/>	FINANCIAL STATEMENT CERTIFICATION	MANDATORY
<input checked="" type="checkbox"/>	MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (ONE FOR EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE)	MANDATORY
<input checked="" type="checkbox"/>	PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (ONE FOR EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE)	MANDATORY
<input checked="" type="checkbox"/>	PRINCIPAL ENTITY FORM (ONE FOR EACH ENTITY THAT IS A PRINCIPAL)	MANDATORY

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APPENDICES

APPENDICES: THE APPENDICES ARE DOCUMENTS THE APPLICANT MUST PROVIDE OR CREATE. THE APPENDICES ARE NOT REPRESENTED IN THE APPLICATION QUESTIONS OR ITS SCHEDULES OR ADDENDA. EACH APPENDIX SHALL BE PRESENTED IN A TABBED MANNER AND EACH TAB MUST INDICATE THE APPENDIX NUMBER AS LISTED BELOW. IF AN APPENDIX DOES NOT APPLY TO AN APPLICANT, WRITE "DOES NOT APPLY" ON THE APPENDIX PAGE.

<input checked="" type="checkbox"/>	APPENDIX 1: DESCRIPTION OF THE BUSINESS CURRENTLY PERFORMED AND THE BUSINESS INTENDED TO BE PERFORMED IN THE COMMONWEALTH. THIS INFORMATION MUST BE SPECIFIC AND MUST BE ORGANIZED AROUND THE TOPICS SHOWN IN <u>SCHEDULES 31 AND 32</u> . ADDITIONALLY, APPLICANT MUST INDICATE THE RELATIONSHIP BETWEEN IT AND ITS AFFILIATED ENTITIES AS IT RELATES TO THE BUSINESS INTENDED TO BE PERFORMED IN THE COMMONWEALTH IN THE FORM OF AN ORGANIZATION CHART WITH A NARRATIVE DESCRIPTION.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 2: DESCRIPTION OF ANY FORMER BUSINESS ENGAGED IN DURING THE LAST TEN (10) YEARS AND THE REASON FOR CESSATION OF THE BUSINESS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 3: DESCRIPTION OF ALL BONUS, PROFIT SHARING, PENSION, RETIREMENT, DEFERRED COMPENSATION AND SIMILAR PLANS. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULE 8</u> .	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 4: DESCRIPTION OF LONG TERM DEBT. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULES 12 AND 13</u> .	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 5: DESCRIPTION OF OTHER INDEBTEDNESS AND SECURITY DEVICES. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULES 14 AND 15</u> .	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 6: DESCRIPTION OF SECURITIES OPTIONS. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULES 16 AND 17</u> .	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 7: DESCRIPTION OF EXISTING LITIGATION. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULE 25</u> .	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 8: AUDITED FINANCIAL STATEMENT FOR THE LAST FISCAL YEAR. IF THE APPLICANT DOES NOT NORMALLY HAVE ITS FINANCIAL STATEMENTS AUDITED, ATTACH UNAUDITED FINANCIAL STATEMENTS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 9: AUDITED FINANCIAL STATEMENTS FOR THE LAST FIVE (5) YEARS. IF THE APPLICANT DOES NOT NORMALLY HAVE ITS FINANCIAL STATEMENTS AUDITED, ATTACH UNAUDITED FINANCIAL STATEMENTS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 10: ANNUAL REPORTS FOR THE LAST FIVE (5) YEARS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 11A: ANNUAL REPORTS PREPARED ON THE SEC'S 10K FOR THE LAST FIVE (5) YEARS. APPENDIX 11B: COPIES OF ANNUAL OR QUARTERLY FILINGS FOR THE LAST FIVE (5) YEARS REQUIRED UNDER THE LAWS OF A REGULATORY AGENCY OF ANOTHER COUNTRY.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 12: A COPY OF THE LAST QUARTERLY UNAUDITED FINANCIAL STATEMENT.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 13: A COPY OR COPIES OF ANY INTERIM REPORTS.	MANDATORY

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<input checked="" type="checkbox"/>	APPENDIX 14: A COPY OF THE LAST DEFINITIVE PROXY OR INFORMATION STATEMENT (SEC).	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 15: A COPY OF ALL REGISTRATION STATEMENTS FOR THE LAST FIVE (5) YEARS FILED IN ACCORDANCE WITH THE SECURITIES ACT OF 1933.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 16: COPIES OF ALL OTHER REPORTS PREPARED IN THE LAST FIVE (5) YEARS BY INDEPENDENT AUDITORS OF THE APPLICANT.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 17: CERTIFIED COPIES OF THE ARTICLES OF INCORPORATION, CHARTER, BYLAWS, PARTNERSHIP AGREEMENT OR OTHER OFFICIAL DOCUMENTS AND ALL AMENDMENTS AND PROPOSED AMENDMENTS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 18: CURRENT OWNERSHIP TABLE OF ORGANIZATION.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 19: FUNCTIONAL TABLE OF ORGANIZATION FOR APPLICANT WITH, JOB DESCRIPTIONS, AND NAMES OF EMPLOYEES EARNING IN EXCESS OF \$250,000 IN ANNUAL COMPENSATION.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 20: COPIES OF FEDERAL ENTITY TAX FILINGS, INCLUDING FORMS 1120, 1120-S, 1120-F, 1065, 941 AND ALL OTHER BUSINESS RELATED TAX FORMS FILED WITH THE IRS IN THE LAST FIVE (5) YEARS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 21: COPIES OF 5500 FORMS FILED WITH THE IRS IN THE LAST FIVE (5) YEARS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 22: DESCRIBE CRIMINAL HISTORY OF APPLICANT. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULE 23</u> . NARRATIVE INFORMATION ABOUT THE NATURE OF CHARGE OR COMPLAINT AND THE DISPOSITION MUST BE PROVIDED.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 23: PURSUANT TO §1312 OF THE GAMING ACT, THE BOARD MAY NOT APPROVE AN APPLICATION FOR LICENSURE IF ANY OF ITS PRINCIPALS DO NOT MEET THE CHARACTER REQUIREMENTS OF §1310, ELIGIBILITY REQUIREMENTS, OR PURCHASES A CONTROLLING INTEREST IN A LICENSED GAMING ENTITY IN VIOLATION OF §1328. HAS THE APPLICANT DIVESTED ALL INTERESTS THAT WOULD PROHIBIT LICENSURE AND ELIMINATED ANY PRINCIPAL WHO DOES NOT MEET THE CHARACTER OR ELIGIBILITY REQUIREMENTS? IF NOT, PROVIDE AN EXPLANATION. IF IT DOES NOT APPLY, WRITE DOES NOT APPLY IN RESPONSE TO THIS APPENDIX.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 24: PURSUANT TO §1330 OF THE GAMING ACT, NO LICENSEE, ITS AFFILIATE, INTERMEDIARY, SUBSIDIARY OR HOLDING COMPANY MAY POSSESS AN OWNERSHIP OR FINANCIAL INTEREST THAT IS GREATER THAN 33.3% OF ANOTHER SLOT MACHINE LICENSEE OR PERSON ELIGIBLE TO APPLY FOR A CATEGORY 1 LICENSE, ITS AFFILIATE, INTERMEDIARY, SUBSIDIARY OR HOLDING COMPANY. DOES THE APPLICANT POSSESS AN OWNERSHIP OR FINANCIAL INTEREST THAT IS GREATER THAN 33.3% OF ANOTHER SLOT MACHINE LICENSEE OR PERSON ELIGIBLE TO APPLY FOR A CATEGORY 1 LICENSE, ITS AFFILIATE, INTERMEDIARY, SUBSIDIARY OR HOLDING COMPANY? PROVIDE AN EXPLANATION OR WRITE "DOES NOT APPLY".	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 25: PURSUANT TO §1512 OF THE GAMING ACT, NO EXECUTIVE-LEVEL STATE EMPLOYEE, PUBLIC OFFICIAL, PARTY OFFICER OR IMMEDIATE FAMILY MEMBER THEREOF SHALL HAVE A FINANCIAL INTEREST IN OR BE EMPLOYED, DIRECTLY OR INDIRECTLY, BY ANY LICENSED RACING ENTITY OR LICENSED GAMING ENTITY, OR ANY HOLDING, AFFILIATE, INTERMEDIARY OR SUBSIDIARY COMPANY, THEREOF, OR ANY SUCH APPLICANT.	MANDATORY

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	HAS ANY PUBLIC OFFICIAL OR OTHER PROHIBITED PERSON POSSESSED A FINANCIAL INTEREST IN OR BEEN EMPLOYED DIRECTLY OR INDIRECTLY BY THE APPLICANT OR RELATED ENTITY AT OR FOLLOWING THE EFFECTIVE DATE OF THE PA GAMING ACT?	
<input checked="" type="checkbox"/>	APPENDIX 26: PURSUANT TO §1313 OF THE GAMING ACT, PROVIDE INFORMATION, DOCUMENTATION AND ASSURANCES DEMONSTRATING THAT THE APPLICANT HAS SUFFICIENT BUSINESS ABILITY AND EXPERIENCE TO CREATE AND MAINTAIN A SUCCESSFUL, EFFICIENT OPERATION. ALSO PROVIDE BIOGRAPHIES OF THE KNOWN INDIVIDUALS WHO WILL PERFORM EXECUTIVE MANAGEMENT DUTIES AND PROVIDE NAMES OF ALL PROPOSED KEY EMPLOYEES AND A DESCRIPTION OF THEIR RESPECTIVE OR PROPOSED RESPONSIBILITIES AS THEY BECOME KNOWN.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 27: PURSUANT TO §1207(16) OF THE GAMING ACT, THE LICENSEE MUST SELL PENNSYLVANIA STATE LOTTERY TICKETS AT ITS FACILITY AS NEAR AS PRACTICABLE TO THE PAY WINDOWS. PROVIDE A PROPOSED FLOOR PLAN SPECIFYING THE LOCATIONS WHERE STATE LOTTERY TICKETS WILL BE SOLD AND THE PROXIMITY OF THOSE LOCATIONS TO PAY WINDOWS. (NOTE: THIS SUBMISSION MUST BE FINALIZED AND APPROVED BY THE BOARD PRIOR TO OPERATION).	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 28: PROVIDE A LIST OF ANY HOSPITAL, PLACE OF WORSHIP, SCHOOL, CHARITABLE INSTITUTION, PARK, ZOO OR ANY SIMILAR PLACE FREQUENTED BY THE PUBLIC WITHIN 1500 FEET OF THE PROPOSED FACILITY.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 29: SUBMIT AN INITIAL NARRATIVE DESCRIPTION OF PROPOSED ADMINISTRATIVE AND ACCOUNTING PROCEDURES, INCLUDING A WRITTEN SYSTEM OF INTERNAL CONTROL, PURSUANT TO §1322 OF THE GAMING ACT (NOTE: THIS SUBMISSION MUST BE FINALIZED AND APPROVED BY THE BOARD PRIOR TO OPERATION).	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 30: PROVIDE MARKETING PLANS AND PROPOSALS AND DETAILS OF THE PROXIMITY OF THE FACILITY TO ITS MARKETING SERVICE AREA.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 31: PROVIDE COPIES OF LOCAL ZONING AND LAND USE APPROVALS OR A DETAILED EXPLANATION OF THE STATUS OF THE REQUEST WITH COPIES OF ALL FILINGS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 32: PURSUANT TO §1322 OF THE GAMING ACT AND/OR BOARD REGULATIONS, SUBMIT A COMPLETE PROPOSED SITE PLAN OF THE PROPOSED LICENSED FACILITY, INCLUSIVE OF TRAFFIC STUDIES AND THE PARKING PLAN, INCLUDING THE NUMBER OF PARKING SPACES, ACCOMPANIED BY ARCHITECTURAL DRAWINGS AND A PROPOSED GAMING FLOOR LAYOUT. THE GAMING FLOOR LAYOUT SHOULD CLEARLY DELINEATE THE SQUARE FOOTAGE OF THE AREA TO BE USED FOR THE PLACEMENT OF SLOT MACHINES AND TABLE GAMES AS WELL AS THE SQUARE FOOTAGE OF THE AREA THAT WILL NOT BE USED FOR THE PLACEMENT OF SLOT MACHINES AND TABLE GAMES. FURTHER, THE GAMING FLOOR LAYOUT SHOULD DELINEATE THE SQUARE FOOTAGE RESERVED FOR ADDITIONAL SLOT MACHINES AND TABLE GAMES PERMITTED PURSUANT TO §1210 AND §13A11 OF THE GAMING ACT. PURSUANT TO §1210, PROVIDE DETAILS OF THE PROPOSED LOCATION OF SLOT MACHINES AND TABLE GAMES AT THE FACILITY AND THE NUMBER OF SLOT MACHINES AND TABLE GAMES REQUESTED. PURSUANT TO §1207 OF THE GAMING ACT, PROPOSED SURVEILLANCE CAMERA LOCATIONS BOTH WITHIN AND OUTSIDE THE PROPOSED LICENSED FACILITY SHOULD ALSO BE CLEARLY DELINEATED ON THE GAMING FLOOR LAYOUT AS WELL AS PROPOSED SECURITY ZONES ON THE GAMING FLOOR AND WITHIN AND OUTSIDE THE LICENSED FACILITY. (NOTE: THE SITE PLAN, GAMING FLOOR LAYOUT AND RELATED SURVEILLANCE AND SECURITY PROPOSALS MUST BE FINALIZED AND APPROVED BY THE BOARD PRIOR TO OPERATION).	MANDATORY

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<input checked="" type="checkbox"/>	APPENDIX 33: PROVIDE DETAILS OF PLANNED RETAIL AND FOOD VENUES FOR THE FACILITY AND THE IDENTIFICATION OF THE OPERATORS OF EACH RETAIL FOOD VENUE.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 34: PROVIDE A LOCAL IMPACT REPORT, ENGINEERING REPORTS AND TRAFFIC STUDIES, INCLUDING DETAILS OF ANY ADVERSE IMPACT ON TRANSPORTATION, TRANSIT ACCESS, HOUSING, WATER AND SEWER SYSTEMS, LOCAL POLICE AND EMERGENCY SERVICE CAPABILITIES, EXISTING TOURISM, INCLUDING HISTORICAL AND CULTURAL RESOURCES OR OTHER MUNICIPAL SERVICE OR RESOURCE. A COPY OF THE LOCAL IMPACT REPORT SHALL BE PROVIDED TO EACH POLITICAL SUBDIVISION IN WHICH THE LICENSED FACILITY WILL BE LOCATED AT LEAST SEVEN (7) DAYS PRIOR TO THE FILING OF THE APPLICATION FOR A SLOT MACHINE LICENSE. THE APPLICANT SHALL FILE A PROOF OF SERVICE WITH THE BOARD.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 35: PROVIDE DETAILS OF LAND ACQUISITION COSTS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 36: PROVIDE DETAILS OF A COMPULSIVE OR PROBLEM GAMBLING PLAN.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 37: IF A TEMPORARY FACILITY IS TO BE LICENSED, PROVIDE DETAILS OF THE TEMPORARY FACILITY AS WELL AS A PLAN FOR HOW THE LICENSEE WILL TRANSITION TO A PERMANENT FACILITY, INCLUDING A DATE FOR THE COMPLETION OF THE PERMANENT FACILITY.	MANDATORY
<input checked="" type="checkbox"/>	<p>APPENDIX 38: AS REQUIRED BY §1325 OF THE GAMING ACT, APPLICANT MUST ADDRESS EACH ITEM LISTED IN THIS SECTION. IF AN ITEM DOES NOT APPLY, THE APPLICANT MUST STATE THAT IN RESPONSE TO EACH ITEM LISTED. PROVIDE A PLAN, WITH DETAILS, FOR THE FOLLOWING:</p> <p>(1) THE LOCATION AND QUALITY OF THE PROPOSED FACILITY, INCLUDING, BUT NOT LIMITED TO, ROAD AND TRANSIT ACCESS, PARKING AND CENTRALITY TO MARKET SERVICE AREA;</p> <p>(2) THE POTENTIAL FOR NEW JOB CREATION AND ECONOMIC DEVELOPMENT WHICH WILL RESULT FROM GRANTING A LICENSE TO THE APPLICANT;</p> <p>(3) THE APPLICANT'S GOOD FAITH PLAN TO RECRUIT, TRAIN AND UPGRADE DIVERSITY IN ALL EMPLOYMENT CLASSIFICATIONS IN THE FACILITY;</p> <p>(4) THE APPLICANT'S GOOD FAITH PLAN FOR ENHANCING THE REPRESENTATION OF DIVERSE GROUPS IN THE OPERATION OF ITS FACILITY THROUGH THE OWNERSHIP AND OPERATION OF BUSINESS ENTERPRISES ASSOCIATED WITH OR UTILIZED BY ITS FACILITY OR THROUGH THE PROVISION OF GOODS OR SERVICES UTILIZED BY ITS FACILITY AND THROUGH THE PARTICIPATION IN THE OWNERSHIP OF THE APPLICANT. PROVIDE SPECIFIC INFORMATION REGARDING THE DIVERSITY IN OWNERSHIP OF THE APPLICANT, I.E. MINORITIES, WOMEN;</p> <p>(5) THE APPLICANT'S GOOD FAITH EFFORT TO ASSURE THAT ALL PERSONS ARE ACCORDED EQUALITY OF OPPORTUNITY IN EMPLOYMENT AND CONTRACTING BY IT AND ANY CONTRACTORS, SUBCONTRACTORS, ASSIGNEES, LESSEES, AGENTS, GAMING SERVICE PROVIDERS AND SUPPLIERS IT MAY EMPLOY DIRECTLY OR INDIRECTLY;</p> <p>(6) THE HISTORY AND SUCCESS OF THE APPLICANT IN DEVELOPING TOURISM FACILITIES ANCILLARY TO GAMING DEVELOPMENT, IF APPLICABLE TO THE APPLICANT;</p> <p>(7) THE DEGREE TO WHICH THE APPLICANT PRESENTS A PLAN FOR THE PROJECT WHICH WILL LIKELY LEAD TO THE CREATION OF QUALITY, LIVING-WAGE JOBS AND FULL-TIME PERMANENT JOBS FOR RESIDENTS OF THIS COMMONWEALTH GENERALLY AND FOR RESIDENTS OF THE HOST POLITICAL SUBDIVISION IN PARTICULAR;</p> <p>(8) THE RECORD OF THE APPLICANT AND ITS DEVELOPER IN MEETING COMMITMENTS</p>	MANDATORY

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	<p>TO LOCAL AGENCIES, COMMUNITY-BASED ORGANIZATIONS AND EMPLOYEES IN OTHER LOCATIONS;</p> <p>(9) THE DEGREE TO WHICH POTENTIAL ADVERSE EFFECTS WHICH MIGHT RESULT FROM THE PROJECT, INCLUDING COSTS OF MEETING THE INCREASED DEMAND FOR PUBLIC HEALTH CARE, CHILD CARE, PUBLIC TRANSPORTATION, AFFORDABLE HOUSING AND SOCIAL SERVICES, WILL BE MITIGATED;</p> <p>(10) THE RECORD OF THE APPLICANT AND ITS DEVELOPER REGARDING COMPLIANCE WITH</p> <p>(i) FEDERAL, STATE AND LOCAL DISCRIMINATION, WAGE AND HOUR, DISABILITY AND OCCUPATIONAL AND ENVIRONMENTAL HEALTH AND SAFETY LAWS AS WELL AS</p> <p>(ii) STATE AND LOCAL LABOR RELATIONS AND EMPLOYMENT LAWS;</p> <p>(iii) THE APPLICANT'S RECORD IN DEALING WITH ITS EMPLOYEES AND THEIR REPRESENTATIVES AT OTHER LOCATIONS.</p>	
<input checked="" type="checkbox"/>	<p>APPENDIX 39: PROVIDE INFORMATION DEMONSTRATING ADEQUATE FINANCING FOR THE PROPOSED FACILITY AND TERMS OF FINANCING INCLUDING PAYBACK PERIOD.</p>	MANDATORY
<input checked="" type="checkbox"/>	<p>APPENDIX 40: PROVIDE BUSINESS AND ECONOMIC DEVELOPMENT PLANS AND TIMETABLES, PROJECTED DEBT SERVICE EXPENSES, PROJECTED EBITDA AND INTERNAL RATE OF RETURN, PROJECTED ANNUAL GROSS TERMINAL REVENUE, PROJECTED OPERATING AND CAPITAL EXPENSES AND DEFINED GAMING MARKET AND PROJECTED VISITATION.</p>	MANDATORY
<input checked="" type="checkbox"/>	<p>APPENDIX 41: PROVIDE LETTERS OF REFERENCE FROM LAW ENFORCEMENT AGENCIES HAVING JURISDICTION IN THE APPLICANT'S AND PRINCIPAL'S MAIN PLACE OF RESIDENCE AND PLACE OF BUSINESS INDICATING THAT THE AGENCY DOES NOT HAVE ANY PERTINENT INFORMATION RELATING TO THE APPLICANT OR ITS PRINCIPALS. IF THE LAW ENFORCEMENT AGENCY HAS INFORMATION PERTAINING TO THE APPLICANT OR ITS PRINCIPALS, THE LETTER SHALL SPECIFY THE DETAILS OF THE INFORMATION.</p> <p>IF NO LETTERS ARE RECEIVED WITHIN 30 DAYS OF THE REQUEST, THE APPLICANT OR PRINCIPAL MAY SUBMIT A SWORN OR AFFIRMED STATEMENT THAT THE APPLICANT OR PRINCIPAL IS A CITIZEN IN GOOD STANDING IN HIS JURISDICTION OF RESIDENCE AND PRIMARY PLACE OF BUSINESS.</p>	MANDATORY
<input checked="" type="checkbox"/>	<p>APPENDIX 42: IF THE APPLICANT HAS HELD A GAMING LICENSE IN ANY JURISDICTION, PROVIDE A LETTER OF REFERENCE FROM THE GAMING OR CASINO ENFORCEMENT OR REGULATORY AGENCY IN THE OTHER JURISDICTION, SPECIFYING THE EXPERIENCES OF THE AGENCY WITH THE APPLICANT, THE APPLICANT'S ASSOCIATES AND THE APPLICANT'S GAMING OPERATION.</p> <p>IF NO LETTER IS RECEIVED WITHIN 30 DAYS OF REQUEST BY THE APPLICANT, THE APPLICANT MAY SUBMIT A SWORN OR AFFIRMED STATEMENT THAT THE APPLICANT'S OPERATION IS IN GOOD STANDING WITH THE REGULATORY AGENCY.</p>	MANDATORY
<input checked="" type="checkbox"/>	<p>APPENDIX 43: PROVIDE AN ORIGINAL PAYMENT BOND OR AN ORIGINAL IRREVOCABLE LETTER OF CREDIT THAT INCLUDES A DRAW CERTIFICATE, AT THE APPLICANT'S OPTION, GUARANTEEING THE APPLICANT'S PAYMENT OF THE SLOT MACHINE LICENSE FEE REQUIRED BY §1209 (FOR CATEGORY 1 AND 2) AND §1305 (CATEGORY 3) OF THE GAMING ACT.</p>	MANDATORY
<input checked="" type="checkbox"/>	<p>APPENDIX 44: PROVIDE A CHART OF EXISTING GAMING SERVICE PROVIDERS* INCLUDING THE NAME, ADDRESS, PHONE AND TAX IDENTIFICATION NUMBER OF THE GAMING SERVICE PROVIDERS, TYPES OF GOODS AND/OR SERVICES PROVIDED BY THE GAMING SERVICE PROVIDERS, TOTAL DOLLAR AMOUNT OF BUSINESS WITH GAMING SERVICE PROVIDERS IN THE PAST TWELVE (12) MONTHS AND TOTAL DOLLAR</p>	MANDATORY

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	<p>AMOUNT OF BUSINESS EXPECTED TO BE CONDUCTED WITH GAMING SERVICE PROVIDERS IN THE NEXT TWELVE (12) MONTHS.</p> <p>* GAMING SERVICE PROVIDERS IS DEFINED IN 58 PA. CODE §401A.3.</p>	
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CATEGORY 1 APPLICANTS ONLY

<input type="checkbox"/>	<p>APPENDIX 45: PURSUANT TO §1308(c) OF THE GAMING ACT, THE BOARD AND THE COMMISSIONS SHALL NOT CONSIDER ANY APPLICATION FOR A LICENSE IF THE APPLICANT OR ANY PERSON AFFILIATED WITH OR DIRECTLY RELATED TO THE APPLICANT IS A PARTY IN ANY ONGOING CIVIL PROCEEDING IN WHICH THE PARTY IS SEEKING TO OVERTURN OR OTHERWISE CHALLENGE A DECISION OR ORDER OF THE BOARD OR COMMISSIONS PERTAINING TO THE APPROVAL, DENIAL OR CONDITIONING OF A LICENSE TO CONDUCT THOROUGHBRED OR HARNESS HORSE RACE MEETINGS RESPECTIVELY WITH PARI-MUTUEL WAGERING OR TO OPERATE SLOT MACHINES.</p> <p>IS THE APPLICANT OR AFFILIATED PERSON A PARTY TO ANY ONGOING CIVIL PROCEEDINGS SEEKING TO OVERTURN A DECISION OR ORDER OF THE BOARD OR COMMISSIONS? IF YES, THE BOARD MAY NOT CONSIDER THE APPLICATION. IF NO, PROVIDE A STATEMENT ASSERTING THAT THE APPLICANT IS NOT CHALLENGING THE BOARD OR COMMISSION'S DECISION OR ORDERS.</p>	CATEGORY 1 APPLICANT ONLY
<input type="checkbox"/>	<p>APPENDIX 46: PROVIDE A VERIFICATION FROM THE HORSE RACING COMMISSION OR THE HARNESS RACING COMMISSION STATING THAT THE APPLICANT HAS SATISFIED THE LICENSE ELIGIBILITY REQUIREMENTS UNDER §1302 OF THE GAMING ACT (RELATING TO CONDITIONAL/CATEGORY 1 SLOT MACHINE LICENSE) AND THAT THE APPLICANT SATISFIES THE LIVE RACING REQUIREMENTS UNDER §1303 OF THE GAMING ACT.</p>	CATEGORY 1 APPLICANT ONLY
<input type="checkbox"/>	<p>APPENDIX 47: PROVIDE A STATEMENT DETAILING THE APPLICANT'S REGULATORY HISTORY AS A LICENSED RACING ENTITY UNDER THE JURISDICTION OF THE PENNSYLVANIA HORSE RACING COMMISSION OR STATE HARNESS RACING COMMISSION, INCLUDING THE APPLICANT'S HISTORY OF SUITABILITY AND COMPLIANCE WITH THE RACE HORSE INDUSTRY REFORM ACT IN THE OPERATION OF THE RACE TRACK AND NONPRIMARY LOCATIONS AND THE CONDUCT OF PARI-MUTUEL WAGERING.</p>	CATEGORY 1 APPLICANT ONLY
<input type="checkbox"/>	<p>APPENDIX 48: PROVIDE A DETAILED PLAN FOR THE MANAGEMENT OF ACCOUNTS CREATED FROM FUNDS ALLOCATED UNDER §1406 OF THE GAMING ACT (RELATING TO DISTRIBUTIONS FROM PENNSYLVANIA RACE HORSE DEVELOPMENT FUND).</p>	CATEGORY 1 APPLICANT ONLY
<input type="checkbox"/>	<p>APPENDIX 49: PROVIDE A DETAILED PLAN FOR THE MANAGEMENT AND USE OF BACKSIDE AREA IMPROVEMENT AND MAINTENANCE ACCOUNTS UNDER §1404 OF THE GAMING ACT (RELATING TO DISTRIBUTION FROM LICENSEE'S REVENUE RECEIPTS).</p>	CATEGORY 1 APPLICANT ONLY

CATEGORY 3 APPLICANTS ONLY

<input type="checkbox"/>	<p>APPENDIX 50: PROVIDE A STATEMENT DETAILING THE PROPOSED PLANS AND LOCATION OF THE LICENSED FACILITY AND EXPLAIN HOW THE FACILITY WILL BE LOCATED AT A WELL-ESTABLISHED RESORT HOTEL (AS DEFINED IN BOARD REGULATIONS). INCLUDE A STATEMENT OF THE NUMBER OF ROOMS UNDER COMMON OWNERSHIP, AND HOW EACH ROOM IS HELD, I.E. NON-DEEDED TIME SHARE, DEEDED TIME SHARE AND STANDARD HOTEL ROOM. ALSO INCLUDE IN THE STATEMENT A LIST OF THE SUBSTANTIAL YEAR-ROUND RECREATIONAL GUEST AMENITIES OFFERED. THE STATEMENT MUST ALSO DEMONSTRATE COMPLIANCE WITH THE GEOGRAPHICAL REQUIREMENTS OF §1305(B) OF THE GAMING ACT</p>	CATEGORY 3 APPLICANT ONLY
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	(RELATING TO CATEGORY 3 SLOT MACHINE LICENSE), WHICH PROVIDES THAT NO CATEGORY 3 LICENSEE SHALL BE LOCATED WITHIN 15 LINEAR MILES OF ANOTHER LICENSED FACILITY.	
<input type="checkbox"/>	APPENDIX 51: PROVIDE DOCUMENTATION TO THE BOARD PROVING THAT THE APPLICANT IS THE OWNER OF THE WELL-ESTABLISHED RESORT HOTEL OR IS A WHOLLY OWNED SUBSIDIARY OF THE OWNER OF THE WELL-ESTABLISHED RESORT HOTEL.	CATEGORY 3 APPLICANT ONLY
<input type="checkbox"/>	APPENDIX 52: PROVIDE A STATEMENT DETAILING THE APPLICANT'S PROPOSED AMENITIES PLAN. EXPLAIN THE AMENITIES THAT THE APPLICANT INTENDS TO MAKE AVAILABLE AT THE RESORT HOTEL AND THE COSTS OF THE AMENITIES TO PATRONS OF THE RESORT HOTEL.	CATEGORY 3 APPLICANT ONLY
<input type="checkbox"/>	APPENDIX 53: PROVIDE A PROPOSED FEE SCHEDULE FOR EACH AMENITY OFFERED AT THE WELL-ESTABLISHED RESORT AND A JUSTIFICATION FOR HOW THE FEES MEET THE DEFINITION OF NON-DE MINIMIS CONSIDERATION (AS DEFINED IN BOARD REGULATIONS). THE FEE SCHEDULE SHOULD INCLUDE PROPOSED FEES FOR SEASONAL OR YEAR-ROUND MEMBERSHIPS.	CATEGORY 3 APPLICANT ONLY
<input type="checkbox"/>	APPENDIX 54: PROVIDE A PLAN DETAILING HOW THE APPLICANT, AS PART OF ITS OPERATIONAL PLAN, WILL MONITOR THE GAMING AREA TO ENSURE COMPLIANCE WITH REGULATIONS RELATING TO SELF-EXCLUSION; PERSONS REQUIRED TO BE EXCLUDED AND UNDERAGE GAMING AND THAT ONLY THE FOLLOWING PERSONS ARE PERMITTED TO ENTER THE GAMING AREA: (1) REGISTERED OVERNIGHT GUESTS; (2) PATRONS OF ONE OR MORE AMENITIES (AS PATRON OF THE AMENITIES IS DEFINED IN BOARD REGULATIONS); (3) AUTHORIZED EMPLOYEES; (4) ANY OTHER PERSONS AUTHORIZED BY THE BOARD. THE PLAN SHOULD INCLUDE METHODS FOR CONTROLLING ACCESS TO THE GAMING FLOOR BY THOSE INDIVIDUALS HOLDING VALID SEASONAL OR YEAR-ROUND MEMBERSHIPS AND PATRONS OF THE AMENITIES SEEKING TO ACCESS THE GAMING FLOOR WITHIN 72 HOURS OF THE USE OF THE AMENITY.	CATEGORY 3 APPLICANT ONLY

Mr. Zanan acted on behalf of Tower Entertainment, LLC as corporate counsel in the formation of the entity. He is not an officer or director of Tower Entertainment, LLC.

SCHEDULE 1: INCORPORATORS/FOUNDERS

NAME AND ADDRESS		NAME AND ADDRESS	
FIRST NAME Michael	MIDDLE NAME P.	LAST NAME Zanan	SUFFIX (JR., SR., ETC.)
OCCUPATION		TITLE	
ADDRESS LINE 1		ADDRESS LINE 2	
ADDRESS LINE 3		CITY	STATE/PROVINCE
COUNTRY	EMAIL ADDRESS	PHONE NUMBER ()	FAX NUMBER ()
MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED? PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED?			
NAME AND ADDRESS		NAME AND ADDRESS	
FIRST NAME	MIDDLE NAME	LAST NAME	SUFFIX (JR., SR., ETC.)
OCCUPATION		TITLE	
ADDRESS LINE 1		ADDRESS LINE 2	
ADDRESS LINE 3		CITY	STATE/PROVINCE
COUNTRY	EMAIL ADDRESS	PHONE NUMBER ()	FAX NUMBER ()
MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED? PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED?			
NAME AND ADDRESS		NAME AND ADDRESS	
FIRST NAME	MIDDLE NAME	LAST NAME	SUFFIX (JR., SR., ETC.)
OCCUPATION		TITLE	
ADDRESS LINE 1		ADDRESS LINE 2	
ADDRESS LINE 3		CITY	STATE/PROVINCE
COUNTRY	EMAIL ADDRESS	PHONE NUMBER ()	FAX NUMBER ()
MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED? PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED?			

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

LIST ALL OTHER NAMES UNDER WHICH APPLICANT HAS DONE BUSINESS AND GIVE APPROXIMATE TIME PERIODS DURING WHICH NAME WAS USED.

[illegible]

SCHEDULE 3: ADDRESSES CURRENTLY USED BY APPLICANT

PROVIDE ALL ADDRESSES CURRENTLY USED BY APPLICANT.

ADDRESSES					
ADDRESS PURPOSE					
Registered Office					
ADDRESS LINE 1	2711 Centerville Road				
ADDRESS LINE 2	Suite 400				
CITY	Wilmington	STATE/PROVINCE	DE	POSTAL CODE	19808
COUNTRY	USA	PHONE NUMBER	() 215-467-4600	FAX NUMBER	()
Principal Place of Business					
ADDRESS LINE 1	1033 N. 2nd Street				
ADDRESS LINE 2	Suite 2A				
CITY	Philadelphia	STATE/PROVINCE	PA	POSTAL CODE	19123
COUNTRY	USA	PHONE NUMBER	() 215-467-4600	FAX NUMBER	()
Proposed Location of Category 2 Facility					
ADDRESS LINE 1	400 North Broad Street				
ADDRESS LINE 2					
CITY	Philadelphia	STATE/PROVINCE	PA	POSTAL CODE	19130
COUNTRY	USA	PHONE NUMBER	() 215-467-4600	FAX NUMBER	()
ADDRESS PURPOSE					
ADDRESS LINE 1					
ADDRESS LINE 2					
CITY		STATE/PROVINCE		POSTAL CODE	
COUNTRY		PHONE NUMBER		FAX NUMBER	

Initials *mw*

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SCHEDULE 4: ADDRESSES USED BY APPLICANT

PROVIDE ALL ADDRESSES, OTHER THAN THOSE LISTED ON SCHEDULE 3, WHICH APPLICANT HAS USED OR FROM WHICH IT WAS CONDUCTING BUSINESS DURING THE LAST TEN (10) YEAR PERIOD, AND PROVIDE THE APPROXIMATE DATES DURING WHICH SUCH ADDRESSES WERE USED.

ADDRESS PURPOSE		ADDRESS USED FROM		ADDRESS USED TO	
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY	STATE/PROVINCE	POSTAL CODE	
COUNTRY	EMAIL ADDRESS	PHONE NUMBER ()		FAX NUMBER ()	
ADDRESS PURPOSE		ADDRESS USED FROM		ADDRESS USED TO	
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY	STATE/PROVINCE	POSTAL CODE	
COUNTRY	EMAIL ADDRESS	PHONE NUMBER ()		FAX NUMBER ()	
ADDRESS PURPOSE		ADDRESS USED FROM		ADDRESS USED TO	
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY	STATE/PROVINCE	POSTAL CODE	
COUNTRY	EMAIL ADDRESS	PHONE NUMBER ()		FAX NUMBER ()	
ADDRESS PURPOSE		ADDRESS USED FROM		ADDRESS USED TO	
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY	STATE/PROVINCE	POSTAL CODE	
COUNTRY	EMAIL ADDRESS	PHONE NUMBER ()		FAX NUMBER ()	

DOES NOT APPLY

PROVIDE THE FOLLOWING INFORMATION FOR ALL OFFICERS, DIRECTORS/PARTNERS AND TRUSTEES, GRANTORS OR BENEFICIARIES OF A TRUST THAT IS REQUIRED TO BE LICENSED AS A PRINCIPAL UNDER THIS CHAPTER.

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

SCHEDULE 6: FORMER (NO LONGER ACTIVE) OFFICERS, DIRECTORS/PARTNERS AND TRUSTEES

PROVIDE THE FOLLOWING INFORMATION FOR ALL OFFICERS, DIRECTORS/PARTNERS AND TRUSTEES WHO ARE NO LONGER ACTIVELY INVOLVED WITH APPLICANT BUT WHO HELD A POSITION DURING THE LAST TEN (10) YEAR PERIOD.

[illegible]

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

PROVIDE THE FOLLOWING INFORMATION FOR ALL PRINCIPALS NOT OTHERWISE DISCLOSED ON SCHEDULES 1, 5, 10, 10A, 11, 13 AND 15. INCLUDE INDIVIDUALS AND ENTITIES THAT HAVE A 1% OR GREATER INDIRECT OWNERSHIP INTEREST IN AN APPLICANT OR LICENSEE; HOWEVER, INDIVIDUALS OR ENTITIES WHO HOLD LESS THAN 5% OF THE VOTING SECURITIES OF AN APPLICANT OR LICENSEE OR AN INTERMEDIARY OR HOLDING COMPANY OF AN APPLICANT OR LICENSEE THAT IS A PUBLICLY TRADED COMPANY SHALL NOT BE REQUIRED TO BE LICENSED AS A PRINCIPAL.

[illegible]

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

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SCHEDULE 22: INSIDER TRANSACTIONS

PROVIDE THE FOLLOWING INFORMATION FOR EACH CHANGE IN THE BENEFICIAL OWNERSHIP OF THE EQUITY SECURITIES OF APPLICANT ON THE PART OF ANY PERSON WHO IS INDIRECTLY OR DIRECTLY A BENEFICIAL OWNER OF MORE THAN TEN PERCENT (10%) OF ANY CLASS OF AN EQUITY SECURITY OF APPLICANT OR WHO IS OR WAS WITHIN THAT PERIOD A DIRECTOR OR OFFICER OF APPLICANT THAT OCCURRED WITHIN THE FIVE (5) YEARS PRECEDING THIS APPLICATION. [INCLUDE CHANGES RESULTING FROM (A) GIFT, (B) PURCHASE, (C) SALE, (D) EXERCISE OF AN OPTION TO PURCHASE, (E) EXERCISE OF AN OPTION TO SELL, (F) GRANT OR RECEIPT OF A PUT OR (G) GRANT OR RECEIPT OF A CALL.]

NAME AND HOME ADDRESS		SUFFIX (JR., SR., ETC.)	DATE OF BIRTH
FIRST NAME	MIDDLE NAME	LAST NAME	
ADDRESS LINE 1		ADDRESS LINE 2	
ADDRESS LINE 3		CITY	STATE/PROVINCE
COUNTRY	EMAIL ADDRESS	PHONE NUMBER () ()	POSTAL CODE
POSITION		FAX NUMBER () ()	
DATE OF TRANSACTION	NATURE OF TRANSACTION	ACTION	
DOES NOT APPLY		OTHER PARTIES (NAMES & POSITIONS)	

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

SCHEDULE 25: EXISTING LITIGATION

PROVIDE THE FOLLOWING INFORMATION AND ATTACH AS APPENDIX 7 A DESCRIPTION OF ALL EXISTING CIVIL LITIGATION TO WHICH APPLICANT, ITS PARENT, AFFILIATE, OR SUBSIDIARY IS PRESENTLY A PARTY, WHETHER IN THIS COMMONWEALTH OR IN ANOTHER JURISDICTION. DO NOT INCLUDE ANY LITIGATION IN WHICH THE DAMAGES MAY NOT REASONABLY BE EXPECTED TO EXCEED \$100,000, OR LITIGATION IN WHICH DAMAGES MAY BE EXPECTED TO EXCEED \$100,000, BUT WHICH INVOLVES CLAIMS AGAINST APPLICANT WHICH ARE FULLY AND COMPLETELY COVERED UNDER AN INSURANCE POLICY HELD BY THE APPLICANT WITH A LICENSED INSURANCE CARRIER. THIS DESCRIPTION MUST INCLUDE THE TITLE AND DOCKET NUMBER OF THE LITIGATION, THE NAME AND LOCATION OF THE COURT BEFORE WHICH IT IS PENDING, THE IDENTITY OF ALL PARTIES TO THE LITIGATION AND THE GENERAL NATURE OF ALL CLAIMS BEING MADE.

NAME OF CASE AND DOCKET NUMBER	<div data-bbox="658 766 838 1351" data-label="Text"> <p>DOES NOT APPLY</p> </div>	<p>EXISTING LITIGATION LOCATION AND NAME OF COURT BEFORE WHICH LITIGATION IS PENDING</p>
NAMES OF ALL PARTIES TO LITIGATION		
NATURE OF THE CLAIMS		
NAME OF CASE AND DOCKET NUMBER	<div data-bbox="658 766 838 1351" data-label="Text"> <p>DOES NOT APPLY</p> </div>	<p>EXISTING LITIGATION LOCATION AND NAME OF COURT BEFORE WHICH LITIGATION IS PENDING</p>
NAMES OF ALL PARTIES TO LITIGATION		
NATURE OF THE CLAIMS		

JS
Initials

SCHEDULE 26: ANTITRUST, TRADE REGULATION & SECURITY JUDGMENTS; STATUTORY AND REGULATORY VIOLATIONS

IF APPLICANT ANSWERED YES TO QUESTIONS 3 OR 4 ON PAGE 8, PROVIDE THE FOLLOWING INFORMATION:

NAME OF CASE & DOCKET NUMBER	DATE OF JUDGMENT, ORDER OR DECREE	VIOLATION:	NAME AND ADDRESS OF AGENCY OR COURT INVOLVED
NATURE OF OFFENSE			
DISPOSITION <input type="checkbox"/> ACQUITTED <input type="checkbox"/> CONVICTED <input type="checkbox"/> DISMISSED <input type="checkbox"/> OTHER			
NATURE OF JUDGMENT, DECREE OR ORDER			
NAME OF CASE & DOCKET NUMBER	DATE OF JUDGMENT, ORDER OR DECREE	DOES NOT APPLY	
NATURE OF OFFENSE			
DISPOSITION <input type="checkbox"/> ACQUITTED <input type="checkbox"/> CONVICTED <input type="checkbox"/> DISMISSED <input type="checkbox"/> OTHER			
NATURE OF JUDGMENT, DECREE OR ORDER			

ML
Initials

SCHEDULE 27: BANKRUPTCY OR INSOLVENCY PROCEEDINGS

IF APPLICANT ANSWERED YES TO QUESTIONS 5, 6 AND/OR 7 ON PAGE 8, PROVIDE THE FOLLOWING:

NAME OF CASE & DOCKET NUMBER		BANKRUPTCY, OR INSOLVENCY PROCEEDINGS NAME AND ADDRESS OF AGENCY OR COURT INVOLVED		DATE RECEIVER, AGENT OR TRUSTEE APPOINTED
DATE PETITION FILED OR RELIEF SOUGHT		NAME OF COURT APPOINTED RECEIVER, AGENT OR TRUSTEE		
DATE JUDGMENT OR RELIEF ENTERED				
NATURE OF JUDGMENT OR RELIEF				
<div style="border: 1px solid black; padding: 20px; width: 100%;">DOES NOT APPLY</div>				

[Handwritten Signature]

SCHEDULE 28: NON-GAMING LICENSES AND PERMITS

IF APPLICANT ANSWERED YES TO QUESTION 8 ON PAGE 8, PROVIDE THE FOLLOWING INFORMATION FOR THE LAST TEN (10) YEAR PERIOD:

APPLICANT LICENSING (GOVERNMENT ISSUED - NON-GAMING)				
TYPE OF LICENSE OR PERMIT	NAME AND LOCATION OF GOVERNMENT AGENCY	APPLICATION NUMBER	DISPOSITION	DATE OF DISPOSITION
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED	
			<input type="checkbox"/> GRANTED	
			DOES NOT APPLY	
			<input type="checkbox"/> REVOKED <input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED	
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED	

IF GRANTED, PROVIDE THE LICENSE/PERMIT NUMBER AND EXPIRATION DATE. IF DENIED, PENDING, EXPIRED, SUSPENDED, CONDITIONED, WITHDRAWN OR REVOKED, PROVIDE DETAILS.

SCHEDULE 29: GAMING LICENSES AND PERMITS

IF APPLICANT ANSWERED YES TO QUESTION 9 ON PAGE 9 PROVIDE THE FOLLOWING INFORMATION FOR THE LAST TEN (10) YEAR PERIOD:

APPLICANT LICENSING: (GOVERNMENT ISSUED - GAMING)				
TYPE OF LICENSE OR PERMIT	NAME AND LOCATION OF GOVERNMENT AGENCY	APPLICATION NUMBER	DISPOSITION	DATE OF DISPOSITION
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED	
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED	
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED	
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED	
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED	
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED	
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED	

DOES NOT APPLY

Initials

DESCRIPTION OF PRESENT BUSINESS
Please see Appendix 1 for a description of the present business
DESCRIPTION OF COMPETITIVE CONDITIONS
Please see Appendix 40 for a gaming market analysis
PRINCIPAL PRODUCTS PRODUCED AND/OR SERVICES RENDERED
Does not apply
AVAILABILITY OF RAW MATERIALS, CRITICAL TECHNOLOGY, & EMPLOYEES
Does not apply
INTELLECTUAL PROPERTY OWNED BY APPLICANT & IMPORTANCE TO BUSINESS
Does not apply

DESCRIPTION OF BUSINESS DEVELOPMENTS, INCLUDING BANKRUPTCY, RECEIVERSHIP OR SIMILAR PROCEEDINGS	
	Does not apply
DESCRIPTION OF ANY OTHER MATERIAL REORGANIZATION, READJUSTMENT OR SUCCESSION OF APPLICANT OR ANY OF ITS SUBSIDIARIES OR ACQUISITIONS	
	Does not apply
HISTORY OF PREVIOUS BUSINESS CONDUCTED BY APPLICANT	
	Does not apply

COPY FOR PUBLIC FILE



Pennsylvania Gaming Control Board Licensed Entity Representation Registration

A Licensed Entity Representative includes any person acting on behalf of or representing the interest of any applicant, licensee, permittee or registrant, including but not limited to an attorney (outside counsel representing the applicant/licensee), agent or lobbyist regarding any matter which may reasonably be expected to come before the Pennsylvania Gaming Control Board ("PGCB"). Please include representatives from law firms, public relations firms, representatives from government relations firms and traffic experts. If any law firms were sub-contracted, individuals from these firms who directly represented the applicant/licensee must also complete this form.

NAME:	Michael D. Fabius
FIRM:	Ballard Spahr LLP
ADDRESS:	1735 Market Street, 51st Floor
CITY:	Philadelphia
STATE AND ZIP CODE:	Pennsylvania 19103
TELEPHONE:	215-665-8500
ENTITY REPRESENTED:	Tower Entertainment, LLC

Pursuant to 4 Pa.C.S., §1202.1(b), I am required to register as a licensed entity representative with the PGCB. I have an ongoing duty to regularly update this information and failure to do so could subject my firm and me to a penalty. I also acknowledge that by signing this document, all information contained herein will be made available for review by the public and that such information will be posted on the PGCB website pursuant to 4 Pa.C.S., §1202.1(3).

SIGNATURE: _____

DATE: 11-9-2012

COPY FOR PUBLIC FILE



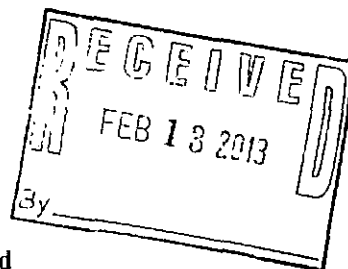
Pennsylvania Gaming Control Board Licensed Entity Representation Registration

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NAME:	Raymond A. Quaglia
FIRM:	Ballard Spahr LLP
ADDRESS:	1735 Market Street, 51st Floor
CITY:	Philadelphia
STATE AND ZIP CODE:	Pennsylvania 19103
TELEPHONE:	215-665-8500
ENTITY REPRESENTED:	Tower Entertainment, LLC

Pursuant to 4 Pa.C.S., §1202.1(b), I am required to register as a licensed entity representative with the PGCB. I have an ongoing duty to regularly update this information and failure to do so could subject my firm and me to a penalty. I also acknowledge that by signing this document, all information contained herein will be made available for review by the public and that such information will be posted on the PGCB website pursuant to 4 Pa.C.S., §1202.1(3).

SIGNATURE: [Signature] DATE: 10/23/12



**Pennsylvania Gaming Control Board
Licensed Entity Representation Registration**

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NAME: Ethan Vickers
 FIRM: Brabender Cox
 ADDRESS: 1218 Grandview Ave.
 CITY: Pittsburgh
 STATE AND ZIP CODE: PA 15211
 TELEPHONE: (412) 434-6342
 ENTITY REPRESENTED: Tower Entertainment, LLC

Pursuant to 4 Pa.C.S., §1202.1(b), I am required to register as a licensed entity representative with the PGCB. I have an ongoing duty to regularly update this information and failure to do so could subject my firm and me to a penalty. I also acknowledge that by signing this document, all information contained herein will be made available for review by the public and that such information will be posted on the PGCB website pursuant to 4 Pa.C.S., §1202.1(3).

SIGNATURE: *Ethan Vickers* DATE: 2/5/13

BB



Pennsylvania Gaming Control Board
Licensed Entity Representation Registration

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NAME: George R. Burrell
FIRM: Kleinbard Bell & Brecker
ADDRESS: 1650 Market Street 46th Floor
CITY: Philadelphia
STATE AND ZIP CODE: Pennsylvania 19103
TELEPHONE: 215 496.7231
ENTITY REPRESENTED: Tower Entertainment, LLC

Pursuant to 4 Pa.C.S., §1202.1(b), I am required to register as a licensed entity representative with the PGCB. I have an ongoing duty to regularly update this information and failure to do so could subject my firm and me to a penalty. I also acknowledge that by signing this document, all information contained herein will be made available for review by the public and that such information will be posted on the PGCB website pursuant to 4 Pa.C.S., §1202.1(3).

SIGNATURE: DATE: 2-6-13

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PENNSYLVANIA POLITICAL CONTRIBUTIONS FORM

IN THE CHART BELOW, PROVIDE THE REQUIRED INFORMATION FOR ALL POLITICAL CONTRIBUTIONS, MONETARY OR IN-KIND, TO A CANDIDATE FOR NOMINATION OR ELECTION TO ANY PUBLIC OFFICE IN THIS COMMONWEALTH, OR TO ANY POLITICAL COMMITTEE OR STATE PARTY IN THIS COMMONWEALTH OR TO ANY GROUP, COMMITTEE OR ASSOCIATION ORGANIZED IN SUPPORT OF ANY SUCH CANDIDATE, POLITICAL COMMITTEE OR STATE PARTY ON OR AFTER THE DATE YOUR ENTITY'S APPLICATION WAS SUBMITTED TO THE PENNSYLVANIA GAMING CONTROL BOARD (BOARD). THE APPLICANT OR LICENSEE MUST LIST POLITICAL CONTRIBUTIONS BY ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES, HOLDING COMPANIES, PRINCIPALS AND KEY EMPLOYEES WHO HOLD SIMILAR GAMING LICENSES IN OTHER JURISDICTIONS. DO NOT INCLUDE CONTRIBUTIONS TO CANDIDATES FOR FEDERAL OFFICES OR TO COMMITTEES OR GROUPS ORGANIZED SOLELY IN SUPPORT OF FEDERAL CANDIDATES.

IF THERE IS MORE THAN ONE CONTRIBUTION TO THE SAME CANDIDATE, POLITICAL COMMITTEE, STATE PARTY, ETC., SEPARATE ENTRIES MUST BE LISTED FOR EACH CONTRIBUTION.

NOTE: IF YOU NEED SPACE FOR ADDITIONAL ENTRIES, PLEASE MAKE ADDITIONAL COPIES OF THIS FORM.

DATE OF CONTRIBUTION	NAME AND ADDRESS OF THE CANDIDATE, POLITICAL COMMITTEE OR STATE PARTY, OR GROUP, COMMITTEE OR ASSOCIATION ORGANIZED IN SUPPORT OF SUCH CANDIDATE, POLITICAL COMMITTEE OR STATE PARTY	AMOUNT OR VALUE OF CONTRIBUTION

DOES NOT APPLY

SIGNATURE OF CEO/AUTHORIZED SIGNATORY

DATE SIGNED

PRINTED NAME OF CEO/AUTHORIZED SIGNATORY - TITLE

*IF A PERSON OTHER THAN THE CEO OF THIS ENTITY IS DESIGNATED TO EXECUTE THIS DOCUMENT, THE BOARD MUST BE PROVIDED WITH A RESOLUTION OR AN AFFIDAVIT, CERTIFIED AS TRUE AND CORRECT, IDENTIFYING THE INDIVIDUAL SO DESIGNATED, AUTHORIZING THAT INDIVIDUAL TO EXECUTE THE DOCUMENT ON BEHALF OF BOTH THE ENTITY AND THE CEO.

mg

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Tower Entertainment, LLC
Primary Applicant/Licensee
Application and Disclosure Information Form

Update, February 11, 2013

APPENDIX 1

DESCRIPTION OF THE BUSINESS CURRENTLY PERFORMED AND THE BUSINESS INTENDED TO BE PERFORMED IN THE COMMONWEALTH.

ADDITIONALLY, APPLICANT MUST INDICATE THE RELATIONSHIP BETWEEN IT AND ITS AFFILIATED ENTITIES AS IT RELATES TO THE BUSINESS INTENDED TO BE PERFORMED IN THE COMMONWEALTH IN THE FORM OF AN ORGANIZATIONAL CHART WITH A NARRATIVE DESCRIPTION.

Please see the attached documents:

- A Description of the Business
- An Organizational Chart With A Narrative Description

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Tower Entertainment, LLC
Primary Applicant/Licensee
Application And Disclosure Information Form

Description of the Business

Tower Entertainment, LLC ("Tower") intends to solely engage in the business of owning and operating the mixed-use entertainment facility at 400 North Broad Street: *The Provence*.

Introduction to *The Provence* at 400 North Broad Street

More specifically, Tower proposes to develop a multi-faceted 1.25 million square foot urban resort complex at the northern edge of Center City that will include amenities unlike any existing development in Philadelphia. *The Provence* will redevelop and feature the iconic Inquirer building as a 125-key hotel. The hotel alone would be an excellent complement to the Pennsylvania Convention Center, a mere two blocks south. Nevertheless, *The Provence* will also offer a remarkable array of non-gaming amenities, the highlight of which will be the creation of a European-style rooftop village that makes the development truly one of a kind. Specific non-gaming amenities will include a concert venue, a comedy club, a jazz club, a nightclub, a spa, a private swim club, a botanical garden, event and wedding facilities, and numerous retail shopping options. Patrons of *The Provence* will also enjoy a variety of dining choices with several full-service restaurants, a sports bar and multiple convenience food outlets. With this substantial offering of non-gaming entertainment, the 123,000 square foot casino will comprise less than 20% of *The Provence* (excluding the parking garages), notwithstanding that the casino will be the economic centerpiece and catalyst for the complex.

Located at 400 North Broad Street, one of the most significant advantages of the project is its proposed location. The resort complex will extend east-west along Callowhill Street from the Inquirer building on Broad Street all the way to 17th Street. With this area presently underdeveloped, the resort complex is ideally located to spur development along the northern edge of Center City. Importantly, the complex will connect North Broad Street south to the Convention Center, as well as to Center City hotels and attractions located across Vine Street.

For additional information regarding *The Provence*, please see the attached review recently published in the Philadelphia Inquirer by architecture critic Inga Saffron in her Changing Skyline newspaper column. See Inga Saffron, More Than a Casino, Philadelphia Inquirer, Nov. 2, 2012.

Positive Impact of *The Provence* at 400 North Broad Street

As documented in the Econsult Corporation's *The Potential Economic And Fiscal Impacts Of The Provence* ("Econsult Report"), *The Provence* will deliver significant tax revenues for the City of Philadelphia and the Commonwealth of Pennsylvania.

- The gaming amenity alone will generate more than \$900,000,000 in gaming tax revenue for the City and Commonwealth over the first five years of operations, as detailed below:

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Primary Applicant/Licensee

Application And Disclosure Information Form

Slot Machine and Table Game Tax Revenue¹

Year	State Gaming Fund & Property Tax Relief	City's Host Fees	State Racing Development Assessment	State Economic Development Assessment	State General Fund Revenue ²
2015	\$88,002,360	\$12,678,942	\$31,059,657	\$12,941,524	\$16,280,062
2016	\$100,719,424	\$14,388,489	\$35,548,032	\$14,811,680	\$17,774,016
2017	\$103,884,532	\$14,840,647	\$36,665,129	\$15,277,137	\$15,713,627
2018	\$106,481,645	\$15,211,664	\$37,581,757	\$15,659,065	\$16,106,467
2019	\$108,877,482	\$15,553,926	\$38,427,347	\$16,011,394	\$16,468,863
Total	\$507,965,444	\$72,673,668	\$179,281,921	\$74,700,801	\$82,343,034

Source: Spectrum Gaming Group; Econsult Report, pp.13-14 (Table 5.1) and A-15 (Appendix G)

- The ongoing operations at *The Provence* will directly or indirectly generate almost \$17,000,000 annually in non-gaming tax revenue for the City and the Commonwealth, as detailed below:

	City of Philadelphia		Commonwealth of Pennsylvania
Wage and Earnings	\$4,200,000	Personal Income	\$2,800,000
Sales, Use, and Hotel	\$1,300,000	Sales, Use, and Hotel	\$6,600,000
Business Privilege	\$1,200,000	Corporate Net Income	\$700,000
Total Per Year	\$6,700,000	Total Per Year	\$10,100,000

Source: Econsult Report, p. 16 (Table 5.3)

- The Provence* will also generate additional ancillary spending within the City and Commonwealth that would not otherwise be spent. This ancillary spending will directly or indirectly generate approximately \$11,500,000 in additional non-gaming tax revenue for the City and the Commonwealth, as detailed below:

	City of Philadelphia		Commonwealth of Pennsylvania
Wage and Earnings	\$1,400,000	Personal Income	\$2,600,000
Sales, Use, and Hotel	\$700,000	Sales, Use, and Hotel	\$4,200,000
Business Privilege	\$700,000	Corporate Net Income	\$2,000,000
Total Per Year	\$2,800,000	Total Per Year	\$8,800,000

Source: Econsult Report, p. 16 (Table 5.4)

- The upfront construction of *The Provence*, a 1.25 million square foot urban resort complex, will generate an additional one-time infusion of \$19,500,000 in non-gaming tax revenue for the City and the Commonwealth, as detailed below:

¹ Revenue projections were developed by Tower's gaming market expert, Spectrum Gaming Group.

² The "General Fund Revenue" detailed above is paid to the Commonwealth's General Fund and is based on a 14% tax rate of the proposed casino's table game revenue for the first two years of operation and a 12% tax rate thereafter.

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	City of <u>Philadelphia</u>		Commonwealth <u>of Pennsylvania</u>
Wage and Earnings	\$3,400,000	Personal Income	\$5,000,000
Sales, Use, and Hotel	\$600,000	Sales, Use, and Hotel	\$8,600,000
Business Privilege	\$900,000	Corporate Net Income	\$1,000,000
<i>One-Time Total</i>	<i>\$4,900,000</i>	<i>One-Time Total</i>	<i>\$14,600,000</i>

Source: Econsult Report, p. 15 (Table 5.2)

The Econsult Report also documents the substantial permanent job growth and temporary construction-related jobs generated by *The Provence* within the City and the Commonwealth.

- There will be an estimated 2,500 employment positions created to operate *The Provence* upon opening. Econsult Report, p.8.
- The ongoing operations at *The Provence* will generate in total approximately 3,000 permanent employment positions within the City (almost 3,700 permanent employment positions within the Commonwealth). Econsult Report, p.8-9 (Table 3.1).
- The ancillary spending generated by *The Provence* within the City and Commonwealth that would not otherwise be spent will spur additional job creation. The Econsult Report determines that this ancillary spending will generate approximately 2,300 permanent employment positions within the City (almost 4,100 permanent employment positions within the Commonwealth). Econsult Report, p. 11 (Table 4.1).
- The upfront construction of *The Provence* will further generate almost 2,000 temporary jobs within the City (more than 6,400 temporary jobs within the Commonwealth) during the construction phase of the new complex. Econsult Report, p. 6 (Table 2.1).

The Econsult Report further concludes that *The Provence* will serve as the catalyst for an additional 2-3 million square feet of new commercial and residential real estate development within a half (1/2) mile radius around *The Provence*, delivering even more benefits for the City and the Commonwealth, including:

- Real estate development investment of approximately \$1 billion along North Broad Street and the northern edge of Center City (Econsult Report, p.19);
- An additional \$9,400,000 annually in non-gaming tax revenue for the City and the Commonwealth, as detailed below:

	City of <u>Philadelphia</u>		Commonwealth <u>of Pennsylvania</u>
Wage and Earnings	\$1,800,000	Personal Income	\$2,200,000
Sales, Use, and Hotel	\$900,000	Sales, Use, and Hotel	\$3,200,000
Business Privilege	\$600,000	Corporate Net Income	\$700,000

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Tower Entertainment, LLC

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Total Per Year \$3,300,000 *Total Per Year* \$6,100,000
Source: Econsult Report, p.22 (Table 6.5)

- An additional one-time infusion of \$68 million in non-gaming tax revenue for the City and the Commonwealth from the upfront construction of the additional commercial and residential development, as detailed below:

	<u>City of Philadelphia</u>		<u>Commonwealth of Pennsylvania</u>
Wage and Earnings	\$8,700,000	Personal Income	\$24,700,000
Sales, Use, and Hotel	\$2,000,000	Sales, Use, and Hotel	\$22,300,000
Business Privilege	\$4,300,000	Corporate Net Income	\$6,000,000
<i>One-Time Total</i>	<i>\$15,000,000</i>	<i>One-Time Total</i>	<i>\$53,000,000</i>

Source: Econsult Report, p. 22 (Table 6.4)

- Additional permanent job creation of approximately 1,700 permanent employment positions within the City (more than 2,150 permanent employment positions within the Commonwealth) from the ongoing operations of the new commercial real estate development (Econsult Report, p. 21 (Table 6.3)); and
- Additional temporary job creation of more than 6,100 temporary jobs within the City (approximately 20,100 temporary jobs within the Commonwealth) from the upfront construction of the additional commercial and residential development (Econsult Report, p.20 (Table 6.1)).

The Provence will deliver significant additional benefits for the City, including:

- A goal to fill 1,000 temporary construction jobs and 1,000 permanent employment positions within the immediate neighborhood of *The Provence*;
- Enhancement of the City's tourism and conventioner marketing efforts by adding a new and exciting mixed-use entertainment option and a 125-key hotel two blocks away from the Convention Center and Center City attractions; and
- A goal to utilize local suppliers and vendors in the construction, procurement of fixtures and operation of the development.

The Philadelphia Inquirer

C 184th Year, No. 155 • City & Suburbs

Friday, Nov. 2, 2012 ★ 2012 Pulitzer Prize Winner ★ \$1.

★ \$1.25 in some locations outside the metro area

JAMES J. ANDERSON SITE:

On the Delaware River next to I-95's Girard Avenue interchange



HOLIDAY INN:

Packer Ave. at the Walt Whitman Bridge



8TH AND MARKET STREETS:

Former DisneyQuest site, now a parking lot



FORMER INQUIRER/DAILY NEWS SITE:

On Callowhill Street between Broad and 16th Streets



Steelman Partners

Changing Skyline By Inga Saffron

More than a casino

Bart Blatstein's plan for an "entertainment resort" on North Broad — retail stores, restaurants, and a theater, along with a casino — is a big step up from suburban-style slots barns.

Gather round, folks. It's time once again for Philadelphia to play everyone's favorite game of chance: Choose a casino location.

It's been seven years since the city went through the arduous exercise of evaluating site proposals for two state-mandated slots parlors — only to find it had been subjected to "a bait-and-switch" of historic proportions. What Philadelphia was promised during that process were a pair of glamorous entertainment complexes packed with hotel and condo towers, theaters, and restaurants. What the city got instead was a Walmart-size barn with slot machines called SugarHouse.

Now, because one of the state's handpicked licensees, Foxwoods, went bust, the city gets to roll the dice again on its second casino. The deadline for applications is Nov. 15 and from three to six bids are expected. While the state Gaming Control Board will decide the winner in late 2013,

the city can start lobbying now for a project that is more than a suburban-style highway box.

Bart Blatstein, the developer behind Northern Liberties' transformative Piazza project, has already offered a template for what that urban alternative might look like. Last week, at a high-end version of an all-you-can-eat buffet — one that drew a pack of political heavyweights — Blatstein rolled out a \$700 million casino-and-shopping proposal for the former Inquirer and Daily News building at Broad and Callowhill Streets called "The Provence."

It's easy to make fun of the plan's kitschier aspects, such as the faux French village perched on the casino roof. But if you strip away the architecture and focus on the project's components, there is no doubt that the mix of retail, restaurants, spas, and theater ups the ante for the rest of the pack. This is really a shopping mall with a

See SKYLINE on D5

Developer Bart Blatstein has unveiled the first proposal for the city's second casino, a complex at Broad and Callowhill Streets called the Provence, pictured in an artist's rendering below. Other sites for possible bids are, from top left, a Delaware waterfront site north of SugarHouse; a stadium-district site near the Walt Whitman Bridge; a surface parking lot at Eighth and Market Streets. TOM GRALISH / Staff Photographer; STEVEN M. FALK / Staff Photographer; CYNTHIA GREER / Staff Artist; Steelman Partners

The Philadelphia Inquirer

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philly.com

Friday, Nov. 2, 2012 ★ 2012 Pulitzer Prize Winner ★ \$1

\$1.25 in some locations outside the metro area



Standing on the roof of the former state office building at Broad and Spring Garden Sts., Bart Blatstein outlined his plans to turn the former Inquirer and Daily News building, in the background, into a casino and resort called the Provence. DAVID MIALETTI/SAH

Changing Skyline By Inga Saffron

Urban casino site could be a winner

SKYLINE from D1
casino attached, and it is a less destructive, more modern way to package gambling in a city such as Philadelphia.

Unlike the proposals we saw in the first round, Blatstein's casino development would occupy a downtown location that is just as easy to reach by foot or transit as by car. The site plan reflects — celebrates, actually — that urban condition with a prominent entrance and street-level restaurants. If the other applicants expect to be credible, they're going to have to match that urban sensibility.

It's not clear how serious the six possible contenders are, but on Thursday an operator announced interest in the Holiday Inn site on Packer Avenue. The word on the street is that operators are looking at a Delaware waterfront site north of SugarHouse as well as sites on East Market Street, across from the Convention Center, and in Nicetown.

While any of the developers could, theoretically, come up with a better mixed-use design than Blatstein's, the car-oriented locations start with a disadvantage. They're too far off the beaten track to lure free-spending tourists and conventioners. SugarHouse, it should be noted, has yet to produce a single spin-off business, unless you count a short-lived pawnshop across the street. The Provence and the other downtown sites have the advantage of being closer to the Convention Center.

Of course, you can already hear the walls of opposition echoing across the city. Not downtown. Not in the historic

newspaper tower! It feels good to shut your eyes, cover your ears, and announce you're firmly opposed to gambling.

Unfortunately, Philadelphia doesn't have a choice in the matter, not since former Gov. Ed Rendell and then-State Sen. Vince Fumo rammed through a bill in 2004 that legalized two gaming parlors here and took zoning control away from the city. The most productive thing the Nutter administration can do now is work to amass political support at home and in Harrisburg so it can get the best deal, economically and civically.

The strength of Blatstein's proposal, designed by Las Vegas' Steelman Partners, is that it updates the casino form. For years, top casinos in Vegas, Singapore, and Macao have been devoting more floor space to what are called "non-gaming activities." Their owners now earn more than half their revenue from stores, restaurants, concerts, and convention meetings, making the casino a kind of a loss leader.

Given that Pennsylvania taxes gambling revenue at 54 percent, while everything else pays a much lower rate, it makes sense for a developer to pack in the non-gaming stuff. At Provence, the retail and entertainment will occupy as much, if not more, floor space than the actual casino.

You also have to give Blatstein credit for cannily zeroing in on a site that is simultaneously urban and auto-friendly. While the Provence would be sited on Callowhill Street like any downtown

building, with a large glass facade oriented toward the Center City skyline, its front door would face the I-676 cloverleaf linking the New Jersey and Pennsylvania suburbs. The access gives it an advantage over a rumored downtown competitor, the parking lot at Eighth and Market Streets.

Blatstein's proposal calls for a large new structure on Callowhill, between 15th and 16th Streets. The casino would occupy the entire second floor and span 15th Street into The Inquirer's old newsroom, a vast, soaring space. Blatstein says he would make the newspaper tower, which fronts Broad Street, into a hotel, preserving a historic building.

At the west end of the project, he would erect a sky bridge over 16th Street to provide access to an existing, 800-car parking garage. An additional 600 spaces would be built under the new casino structure, while 300 more could fit on the ground floor of the newsroom building. The total — 1,700 spaces — is about half the size of the garage SugarHouse wants to build on the waterfront. More important, Blatstein insists he can reach that number without building a new above-ground parking structure. The huge garages, as much as the demands of gambling, are what make casino buildings so unattractive.

It has been 13 years since Blatstein acquired the Schmidts Brewery site, and he's learned quite a bit about urban projects. The Provence would have a walkable sidewalk along its entire Callow-

hill side, as well as five restaurant and retail lots along the street. There is no porte-cochère drop-off. Instead, cars would be valet parked in the back, from an entrance off 16th Street.

Visitors arriving by foot would enter a high-ceilinged lobby. Borrowing a popular feature from Las Vegas' Bellagio, Blatstein envisions a giant "conservatory" greenhouse on the ground floor. Gamblers would take an escalator to the 120,000-square-foot casino, which would include a smaller, 25,000-square-foot VIP section aimed at high rollers.

Those uninterested in gambling could keep riding the escalator to the third level. This is where Blatstein envisions his French village, a three-level theme park of shopping, nightlife, and spas, and a 2,200-seat concert hall. Think of it as NewMarket in the sky.

A stucco Versailles, however, would be all wrong, not just as architecture, but as branding. Blatstein can't seem to resist the urge to replicate European architecture, even though it's impossible for a commercial project to build it in a way that isn't completely tacky. Years ago, he proposed a version of the Spanish Steps at Penn's Landing, and his first design for the Piazza was styled to look like the Piazza Navona.

The architects who completed the Piazza, Erdy McIlenny, ultimately persuaded him to build in a modern style that captured the essence of Philadelphia's rough-edged urbanity. A casino with an urban theme needs a design that conveys that quality — say,

something along the lines of Andre Balazs' Standard Hotel in New York, similarly perched over the High Line. Or, put Northern Liberties on the roof. It's a good bet that this is not the last version of the Provence we'll see.

As Philadelphia knows too well, developers seeking casino licenses start by trotting out gauzy renderings of Paris, France, but end up building something more like Paris, Texas. What if Blatstein calls it quits after building the second-story casino?

He insists that won't happen because his tight urban site requires him to construct the entire project at once. "Even if it's physically possible to build in phases," he says, "I won't do it."

Good to hear the strong words. But this time the city should get it in writing.

Contact Inga Saffron at 215-554-2213 or isaffron@phillynews.com, or follow on Twitter @ingasaffron.

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Tower Entertainment, LLC

Primary Applicant/Licensee

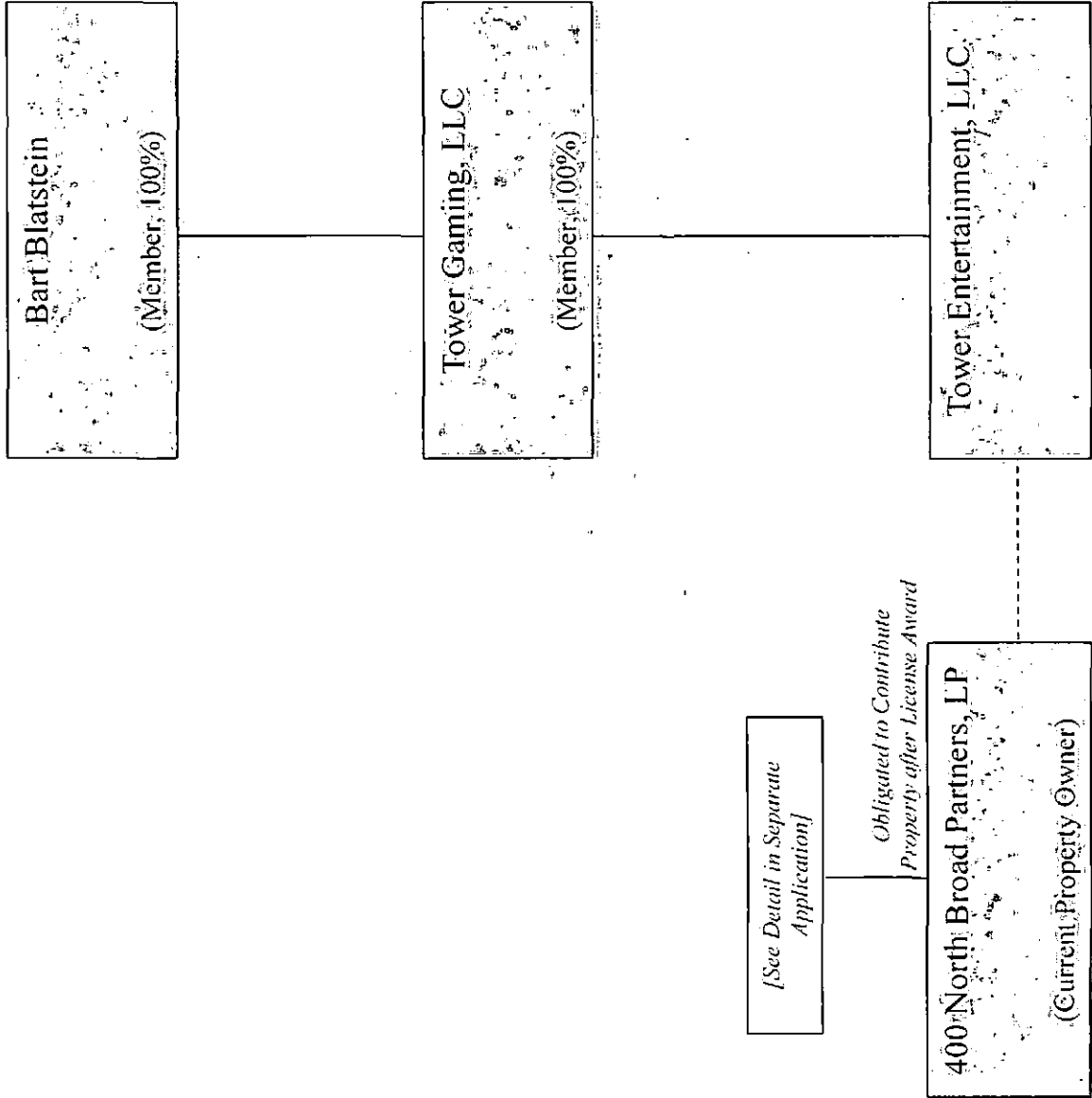
Application And Disclosure Information Form

Organizational Chart With A Narrative Description

As set forth on Tower Entertainment, LLC's ("Tower") attached organizational chart, Tower is a wholly-owned subsidiary of Tower Gaming, LLC, which is 100% owned by Bart Blatstein.

Separately, 400 North Broad Partners, LP ("400 NB Partners") presently owns all four parcels of real estate (the "Property") on which Tower proposes its mixed-use entertainment facility. 400 NB Partners is a real estate holding company that is wholly-owned by Bart Blatstein. A principal entity form has been completed and submitted on behalf of 400 NB Partners.

As such, Tower has clear and unquestionable direct site control through its ultimate owner Bart Blatstein. Furthermore, 400 NB Partners is directly obligated by contract to contribute the Property to Tower in the event the Board awards the license to Tower (See Appendix 35). In such an event, Tower will enter into a transaction with 400 NB Partners whereby Tower becomes the record owner of the Property. The specific form of that transaction (i.e. corporate merger or asset sale) is not yet determined.



Tower Entertainment, LLC
Primary Applicant/Licensee
Application And Disclosure Information Form

APPENDIX 11A

ANNUAL REPORTS PREPARED ON SEC FORM 10-K FOR THE LAST FIVE (5) YEARS

Does not apply.

Tower Entertainment, LLC is not a publicly-traded company required to submit this information to the SEC.

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Tower Entertainment, LLC
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APPENDIX 11B

ANNUAL OR QUARTERLY FILINGS FOR THE LAST FIVE (5) YEARS REQUIRED UNDER THE LAWS OF
A REGULATORY AGENCY OF ANOTHER COUNTRY

Does not apply.

~~Tower Entertainment, LLC is not subject to the laws of a regulatory agency of another~~
country.

COPY FOR PUBLIC FILE

Tower Entertainment, LLC
Primary Applicant/Licensee
Application And Disclosure Information Form

APPENDIX 14

A COPY OF LAST DEFINITIVE PROXY STATEMENT OR INFORMATION STATEMENT (SEC)

Does not apply.

Tower Entertainment, LLC is not a publicly-traded company required to submit this
information to the SEC.

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Tower Entertainment, LLC
Primary Applicant/Licensee
Application And Disclosure Information Form

APPENDIX 15

REGISTRATION STATEMENTS

Does not apply.

Tower Entertainment, LLC is not a publicly-traded company required to submit this
information to the SEC.

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Tower Entertainment, LLC
Primary Applicant/Licensee
Application And Disclosure Information Form

APPENDIX 17

LIMITED LIABILITY COMPANY DOCUMENTS

Please see the attached documents:

- Certificate of Formation
- Bylaws or Operating Agreement
- Authorization to do business in the Commonwealth

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Delaware

PAGE 1


The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT
COPY OF THE CERTIFICATE OF FORMATION OF "TOWER ENTERTAINMENT,
LLC", FILED IN THIS OFFICE ON THE TWENTY-SEVENTH DAY OF
SEPTEMBER, A.D. 2012, AT 11:27 O'CLOCK A.M.

5219225 8100

121074459




Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 9877017

DATE: 09-27-12

You may verify this certificate online
at corp.delaware.gov/authver.shtml

COPY FOR PUBLIC FILE

State of Delaware
Secretary of State
Division of Corporations
Delivered 11:37 AM 09/27/2012
FILED 11:27 AM 09/27/2012
RV 121074459 - 5219225 FILE

CERTIFICATE OF FORMATION

OF

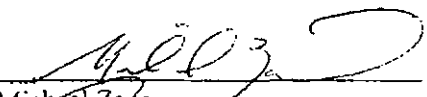
TOWER ENTERTAINMENT, LLC

1. The name of the limited liability company is:

TOWER ENTERTAINMENT, LLC

2. The address of its registered office in the State of Delaware is 2711 Centerville Road, Suite 400, Wilmington, DE 19808 located in the County of New Castle. The name of the limited liability company's registered agent for service of process at such address is Corporation Service Company.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation this 27th day of September, 2012.


Michael Zanan
Authorized Person

COPY FOR PUBLIC FILE

Entity #: 4142985
Date Filed: 10/26/2012
Carol Alchele
Secretary of the Commonwealth

PENNSYLVANIA DEPARTMENT OF STATE CORPORATION BUREAU

Application for Registration - Foreign (15 Pa.C.S.)

- ☐ Registered Limited Liability General Partnership (§ 8211)
☐ Registered Limited Liability Limited Partnership (§ 8211)
☐ Limited Partnership (§ 8582)
☒ Limited Liability Company (§ 8981)

Name
Michael P. Zanan, Esq.

Address
c/o Esquire Assist -- Counter Pickup

City State Zip Code

Document will be returned to the
name and address you enter to
the left.

Commonwealth of Pennsylvania
APPLICATION FOR REGISTRATION 3 Page(s)

Fee: \$250



In compliance with the requirements of the applicable provisions (relating to registration), the undersigned, desiring to register to do business in this Commonwealth, hereby states that:

1. The name to be registered is:
Tower Entertainment, LLC

2. (If the name set forth in paragraph 1 is not available for use in this Commonwealth, complete the following):

The name under which the limited liability company/limited liability partnership/limited partnership proposes to register and do business in this Commonwealth is:

3. The name of the jurisdiction under the laws of which it was organized and the date of its formation:

Jurisdiction: DE Date of Formation: 09/27/2012

4. The (a) address of its initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and street	City	State	Zip	County
1033 North 2nd Street, Suite 2A	Philadelphia	PA	19123	Philadelphia

(b) Name of Commercial Registered Office Provider

County

2012 OCT 26 PM 4:39
PA DEPT OF STATE

COPY FOR PUBLIC FILE

DSCB:15-8981/8211/8582-2

5. Check and complete one of the following:

- ☒ The address of the office required to be maintained by it in the jurisdiction of its organization by the laws of that jurisdiction is:

c/o Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808

Number and street City State Zip

- ☐ It is not required by the laws of its jurisdiction of organization to maintain an office therein and the address of its principal office is:

Number and street City State Zip

6. For Restricted Professional Limited Liability Company Only. Strike out if inapplicable: The company is a ~~restricted professional company organized to render the following professional service(s):~~

Limited Liability Partnership and Limited Partnership: Complete paragraphs 7 and 8

7. The name and business address of each general partner.

Name Business Address

8. The address of the office at which is kept a list of the names and addresses of the limited partners and their capital contribution is:

Number and street City State Zip County

The registered partnership hereby undertakes to keep those records until its registration to do business in the Commonwealth is canceled or withdrawn.

IN TESTIMONY WHEREOF, the undersigned has caused this Application for Registration to be signed by a duly authorized officer/member or manager thereof this

26th day of October, 2012.

Tower Entertainment, LLC

Name of Partnership/Company

Signature

Bart Blatstein, President

Title

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Primary Applicant/Licensee
Application And Disclosure Information Form

APPENDIX 22

CRIMINAL HISTORY OF THE APPLICANT

Tower Entertainment, LLC does not have any criminal history. Please see information in the respective applications for each principal and key employee for any responsive information with respect to each principal and key employee.

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APPENDIX 23

STATEMENT REGARDING SECTIONS 1310, 1312 AND 1328 OF THE GAMING ACT

HAS THE APPLICANT DIVESTED ALL INTERESTS THAT WOULD PROHIBIT LICENSURE AND
ELIMINATED ANY PRINCIPAL WHO DOES NOT MEET THE CHARACTER OR ELIGIBILITY
REQUIREMENTS? IF NOT, PROVIDE AN EXPLANATION. IF IT DOES NOT APPLY, WRITE DOES NOT
APPLY IN RESPONSE TO THIS APPENDIX.

Does not apply.

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APPENDIX 24

STATEMENT REGARDING SECTION 1330 OF THE GAMING ACT

DOES THE APPLICANT POSSESS AN OWNERSHIP OR FINANCIAL INTEREST THAT IS GREATER THAN 33.3% OF ANOTHER SLOT MACHINE LICENSEE OR PERSON ELIGIBLE TO APPLY FOR A CATEGORY 1 LICENSE, ITS AFFILIATE, INTERMEDIARY, SUBSIDIARY OR HOLDING COMPANY?
PROVIDE AN EXPLANATION OR WRITE "DOES NOT APPLY".

Does not apply.

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APPENDIX 28

A LIST OF ANY HOSPITAL, PLACE OF WORSHIP, SCHOOL, CHARITABLE INSTITUTION, PARK, ZOO
OR ANY SIMILAR PLACE FREQUENTED BY THE PUBLIC WITHIN 1,500 FEET OF THE PROPOSED
FACILITY

Community College of Philadelphia

Congregation Rodelph Shalom

Congregation Beth Ahavah

Hahnemann University of Hospital, Drexel University

School District of Philadelphia, Headquarters

Magee Rehabilitation Hospital

Roman Catholic High School

Sunday Breakfast Rescue Mission

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APPENDIX 31

PROVIDE COPIES OF LOCAL ZONING AND LAND USE APPROVALS OR A DETAILED EXPLANATION
OF THE STATUS OF THE REQUEST WITH COPIES OF ALL FILINGS

Please see the attached for a detailed explanation of the local zoning and land use
approval status.

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Detailed Explanation of the Local Zoning and Land Use Approval Status

In August 2012 a new zoning code (the "Zoning Code") became effective in the City of Philadelphia. As part of the Zoning Code, a specific Master Plan District, SP-ENT, was created to accommodate the orderly development of major entertainment facilities, including a licensed gaming facility authorized by the Commonwealth of Pennsylvania pursuant to state law. SP-ENT zoning becomes effective upon application by a landowner, the approval of a master plan and the remapping to SP-ENT by Philadelphia's City Council. The Applicant has not yet commenced the zoning and land use approval process for its proposed site. Upon successfully becoming licensed by the Pennsylvania Gaming Control Board ("PGCB"), the Applicant will promptly seek all zoning and land use approvals.

The designation of the Property to SP-ENT would be done pursuant to the process and procedures set forth in the Zoning Code, which contemplates a public process for the approval of a master plan and the remapping of land for major entertainment facilities. The primary City Agency responsible for shepherding a proposal through this master plan process is the Philadelphia City Planning Commission ("PCPC"); and ultimately Philadelphia City Council approval by ordinance is required.

The Applicant's proposed uses are expressly permitted by the SP-ENT zoning. More specifically, uses permitted in the SP-ENT District include offices, various types of retail sales, assembly and entertainment, casinos, hotel and parking. Objectionable regulated uses, such as adult bookstores and adult entertainment facilities, are expressly prohibited.

As noted above, the Zoning Code sets forth a specific process for remapping land to SP-ENT and any owner may submit a proposed master plan for PCPC's review and recommendation to City Council. PCPC is authorized to approve the master plan if it determines the plan is consistent with the purposes of the SP-ENT district and in compliance with the SP-ENT provisions, and is otherwise consistent in terms of scale, density, accessibility and design. PCPC has 45 days to approve, disapprove, or table a proposed master plan or it will be deemed approved. Based on the master plan, City Council may then approve the master plan and designate by ordinance such areas to be remapped as SP-ENT.

In addition to the use provisions, the SP-ENT district provides development criteria for area, height, open space, setbacks, loading and parking, and signage requirements with which a licensed developer would need to comply. In addition, the Zoning Code provides design standards for building design, siting and access. Compliance with such matters would be determined through the master plan approval process and by review by the City's Department of Licenses and Inspections ("L&I"). In the event that aspects of the development do not meet the criteria of the SP-ENT district, City Council could approve a master plan subject to nonconformities through an amendment to the text of the SP-ENT provisions if City Council determined that the master plan was acceptable and that such amendment was appropriate to further the purposes of the SP-ENT district. Notably, the Zoning Code expressly provides that nothing in that SP-ENT provisions are intended to limit the authority of the PGCB to identify property on which it will permit a gaming facility, nor are the provisions to be construed to

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Application And Disclosure Information Form

prohibit any use exclusively regulated by the Commonwealth under the Gaming Control Board Act.

In this case, the Applicant has assembled the Property on a major accessible corridor in the City's "Central District", a designated planning area identified in "Philadelphia 2035", the City's Comprehensive Plan (the "Comprehensive Plan"). Although a neighborhood plan has not yet been drafted by PCPC for the Central District, a remapping of the Property to SP-ENT to accommodate development as proposed by the Applicant is consistent with the City's stated goals set forth in the Comprehensive Plan. These goals include creating a vision for repurposing the Callowhill industrial area where the Property is located. The plan also sets as goals economic redevelopment, utilization of existing public transit infrastructure, revitalization of commercial corridors, and reuse of existing buildings. The Property, now saddled with an outdated industrial zoning classification, is well-positioned in accordance with the Comprehensive Plan for rezoning to SP-ENT. Moreover, the Applicant is an experienced developer that has successfully sought and obtained remapping of other industrially-zoned property in the immediate vicinity of the proposed development.

Consultants for Applicant anticipate that a master plan submission to be made to PCPC could be completed in 8-12 weeks, and the master plan process, including necessary public hearings then could be started with PCPC. City Council proceedings would follow based on Council's calendar in accordance with Council rules. Concurrent with preparing a plan for submission, Applicant would proceed with submissions to other City departments and agencies for any prerequisite approvals from the Philadelphia Historical Commission, Philadelphia Water Department and Streets Department, in order to facilitate the development and approval of the master plan.

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APPENDIX 34

LOCAL IMPACT REPORT

Please see the local impact report enclosed in the separate, stand-alone binder labeled as such.

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Tower Entertainment, LLC

Primary Applicant/Licensee

Application and Disclosure Information Form

Update, February 11, 2013

APPENDIX 36

A COMPULSIVE AND PROBLEM GAMBLING PLAN

Please see attached.

**Isle Philadelphia Manager, LLC
on behalf of Tower Entertainment, LLC
Compulsive and Problem Gambling Plan
2013**

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5	Individual(s) (or Committee) who will be responsible for the implementation and maintenance of the plan
6	Commitment to train employees and annual reinforcement training
7	Duties and responsibilities of employees designated to implement and participate in the plan <ul style="list-style-type: none">a. Security Departmentb. Surveillance Departmentc. Slots Departmentd. Table Games Departmente. Credit Departmentf. Cashier's Cageg. Marketing Departmenth. Food and Beverage Departmenti. Valet Department
8	The responsibility of patrons
8	Procedures to identify patrons and employees with suspected or known compulsive and problem gambling behavior
9	Procedures for employees to report suspected or identified compulsive or problem gamblers to a designated key employee or other supervisory employee
9	Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior
10	Procedures for responding to patron requests for information
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- 11 List of community, public and private treatment services
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24	Details of outreach program(s) offered to employees and other individuals
24	Plan for posting approved signs in the facility and materials offered to the public
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25	Procedures to prevent cashing of certain checks
26	Procedures Relating to Promotions and Promotions Advertising

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Goals of Isle Philadelphia Manager, LLC's Compulsive and Problem Gambling Plan and procedures and timetables to implement the plan.

Isle Philadelphia Manager, LLC has developed, and will maintain, amend and adjust as necessary, the goals, procedures and timetables of this CPG Plan as outlined below. The procedures set forth in this CPG Plan and its attachments will be followed by the designated employees.

All employees of Isle Philadelphia Manager, LLC are expected to be knowledgeable of, and follow approved procedures consistent with, this CPG Plan. As part of their new employee orientation and annually as reinforcement training, all employees will receive training on the scope, practice and procedures of this CPG Plan as well as training on the CPG Plan itself.

The Compulsive and Problem Gambling Plan will be implemented upon the opening of the facility.

Isle Philadelphia Manager, LLC will:

1. Educate all employees on responsible gaming.
2. Educate all employees on how to recognize some signs of compulsive and problem gambling.
3. Educate all employees on the social and economic costs of compulsive and problem gambling.
4. Educate all employees regarding the relationship between compulsive and problem gambling and other addictive behaviors.
5. Educate all employees on where to locate and how to provide compulsive and problem gambling literature to patrons seeking such information.
6. Educate all employees on the process of reaching out to a patron suspected of compulsive and problem gambling and deliver problem-gambling literature on voluntary treatment services.
7. Make publicly available to patrons brochures and other literature describing responsible gaming, explaining characteristics of compulsive and problem gambling, and where to find professional assistance and/or treatment.
8. Maintain procedures to prevent underage gambling.
9. Maintain procedures to prevent gambling by intoxicated patrons.
10. Conspicuously place signage bearing the toll-free helpline number for the Compulsive Gamblers hotline as specified in the section titled *Plans for posting signs* and as provided in Attachment XXX.
11. Maintain procedures to serve alcoholic beverages responsibly.
12. Advertise responsibly and to avoid using individuals who appear to be under 21 years of age in advertisements.
13. Educate all employees regarding self-exclusion including where to direct a patron who requests to be self-excluded.
14. Establish effective procedures to ensure that all aspect of section 1516 of the act (concerning self-exclusion) is complied with.
15. Mandate attendance at employee orientation and mandate attendance at annual reinforcement trainings regarding compulsive and problem gambling.
16. Ensure that orientation and annual reinforcement training is conducted by a person with specialized knowledge, skill, training and experience in responsible gaming employee training programs as evidenced by the curriculum vitae (Attachment XXX). Departmental specific training is conducted by Department Managers.

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The Regulatory Compliance officer in conjunction with the Vice President/General Manager is responsible for the implementation and maintenance of the plan.

The Regulatory Compliance Officer is charged with reviewing the CPG Plan and ensuring its effective implementation during day-to-day operations of the facility and shall monitor, adjust, and respond to concerns involving the maintenance of the Compulsive and Problem Gambling Plan and ensure meaningful compliance therewith. Any adjustments of the CPG Plan will be reviewed and approved by the Vice President/General Manager. The Regulatory Compliance Officer will also review the Responsible Gaming Log Book.

Commitment to train employees and annual reinforcement training.

Isle Philadelphia Manager, LLC will educate all employees regarding compulsive and problem gambling, the prohibition of underage gambling, the prohibition of gambling by intoxicated patrons, and the identification and ejection of excluded and self-excluded persons. All employees of Isle Philadelphia Manager, LLC will be trained in accordance with the employee training program (Attachment XXX). Appropriate employees, as specified herein, will be trained in the TIPS (Attachment XXX). Employees of specific departments will be trained in departmental specific training regarding policies and procedures as set forth in this Plan. The training program includes training regarding:

1. Characteristics and symptoms of compulsive behavior, including compulsive and problem gambling.
2. The relationship of compulsive and problem gambling to other addictive behavior.
3. The social and economic consequences of compulsive and problem gambling, including debt, treatment costs, suicide, criminal behavior, unemployment and family counseling.
4. Techniques to be used when compulsive and problem gambling is suspected or identified.
5. Techniques to be used to discuss compulsive and problem gambling with patrons and advise patrons regarding community, public and private treatment services.
6. Procedures designed to prevent serving alcohol to visibly intoxicated gaming patrons.
7. Procedures designed to prevent persons from gaming after having been determined to be visibly intoxicated.
8. Procedures for the dissemination of written materials to patrons explaining the self-exclusion program.
9. Procedures for removing an excluded person, an underage individual or a person on the self-exclusion list from a licensed facility including, if necessary, procedures that include obtaining the assistance of appropriate law enforcement personnel.
10. Procedures for preventing an excluded person or a person on the self-exclusion list from being mailed any advertisement, promotion or other target mailing after receiving notice from the Board that the person has been placed on the excluded person or self-exclusion list.
11. Procedures for preventing an individual under 21 years of age from receiving any advertisement, promotion or other target mailing.
12. Procedures to prevent an excluded person, an individual under 21 years of age or a person on the self-exclusion list from having access to or from receiving complimentary services or other like benefits.
13. Procedures to prevent an excluded person, an individual under 21 years of age or a person on the self-exclusion list from cashing checks.

Prior to beginning their assigned duties, all new employees will attend a classroom lecture with sole and specific dedication to the issues of compulsive and problem gambling, the prohibition of underage gambling, the prohibition of gambling by intoxicated patrons, and the identification and ejection of excluded and self-excluded persons.

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All employees will attend annual reinforcement training with sole and specific dedication to the issues of compulsive and problem gambling, the prohibition of underage gambling, the prohibition of gambling by intoxicated patrons, and the identification and ejection of excluded and self-excluded persons.

All employees from the following departments will be trained in TIPS: Security, Surveillance, Slot, Table Games, Credit, Cage, Marketing, F & B Operations and Valet.

Duties and Responsibilities of Employees Designated to Implement or Participate in the Plan.

The following sets forth the duties and responsibilities, by department, of employees designated to implement or participate in the plan.

1. All employees of Isle Philadelphia Manager, LLC are expected to be knowledgeable of, attend trainings and follow approved procedures consistent with, the CPG Plan. This includes reporting suspected or identified compulsive or problem gamblers to supervisory employee. Employees are required to keep the identity of an individual suspected of compulsive or problem gambling confidential.
2. The Director of Human Resources shall engage, on a contractual basis or through employment, a person or business with specialized knowledge, skill, training and experience in responsible gaming employee training programs to conduct the orientation and reinforcement trainings as set forth in the Plan.
3. The Director of Marketing shall engage, on a contractual basis a person or business with specialized knowledge, skill, training and experience in responsible gaming to create, provide and/or review the literature/brochure content.
4. The Internal Audit Department will conduct annual reviews of self-exclusion/exclusion lists, the training program, literature/brochure content, availability and accessibility, and will create annual reports regarding the Plan.
5. Specific departments have duties and responsibilities as set forth below:
 - a. **Security Department**-Security is responsible for the enforcement and reporting of operational efforts, which relate to the prevention of underage gambling, intoxicated gambling, and gambling by excluded and self-excluded persons. This includes identifying and removing underage, intoxicated, excluded and self-excluded persons. Procedures for the Security Department are set forth in this plan.
 - b. **Surveillance Department**-Surveillance is responsible for the electronic monitoring of all gaming areas, areas off the gaming floor where contests or tournaments are conducted and the food and beverage areas in the facility. The Surveillance Manager and surveillance personnel assigned to surveillance duties are responsible for monitoring these areas for patron intoxication, patrons appearing under the age of 21 who are on the gaming floor and/or are engaged in gaming activities and visual identification of excluded and self-excluded persons. Procedures for the Surveillance Department are set forth in this plan.
 - c. **Slots Department**-Slots Department is responsible for attempting to recognize suspected compulsive or problem gambling behavior and identification of underage and intoxicated individuals and the prevention of underage and intoxicated gaming. Slot attendants are also responsible for verifying identification of individuals prior to payment of a hand paid jackpot to ensure that the individual is not underage or on the self-exclusion or exclusion list. Procedures for the Slots Department are set forth in this plan.
 - d. **Table Games Department**-Table Games Department is responsible for attempting to recognize suspected compulsive or problem gambling behavior and identification of underage and intoxicated individuals and the prevention of underage and intoxicated gaming. Table Games employees are also responsible for verifying identification of individuals to ensure that an individual is not underage or on

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the self-exclusion or exclusion list. Procedures for the Table Games Department are set forth in this plan.

- e. **Credit Department**- Credit Department is responsible for ensuring that individuals who are underage or on the self-exclusion, exclusion or voluntary credit suspension lists do not receive credit. The credit department receives the voluntary credit suspension list from the PGCB.
- f. **Cashier's Cage**- Cashier's Cage is responsible for preventing underage individuals and individuals on the exclusion and self-exclusion lists from cashing checks and conducting certain transactions at the cage including the extension of credit. Procedures for verification are set forth in this plan.
- g. **Marketing Department**-Marketing is responsible for ensuring that no individuals who are underage or are on the excluded or self-excluded lists receive player cards, player club privileges, complimentary services or direct mail marketing materials. Marketing is responsible for ensuring that excluded and self-excluded individuals are entered into the CMS system, and flagged, within 5 business days of Isle Philadelphia Manager, LLC receipt of the lists from the PGCB. Procedures for Marketing are set forth in this plan.
- h. **Food and Beverage Department**-Food and Beverage is responsible for preventing the serving alcohol to visibly intoxicated gaming patrons and underage individuals and for notifying security to prevent persons from gaming after having been determined to be visibly intoxicated. Procedures for Food and Beverage are set forth in this plan.
- i. **Valet Department**-Valet is responsible for preventing intoxicated patrons from obtaining a valet parked car to leave the facility.

The Responsibility of Patrons with Respect to Responsible Gambling.

- 1. Isle Philadelphia Manager, LLC utilizes a brochure, which provides patron responsibilities regarding responsible gambling (Attachment XXX).
- 2. Nine areas of responsible gaming include:
 - a. Gambling for entertainment purposes.
 - b. Treating the money lost as the cost of entertainment.
 - c. Setting a dollar limit and sticking to it.
 - d. Setting a time limit and sticking to it.
 - e. Expecting to lose.
 - f. Creating balance in your life.
 - g. Avoiding "chasing" lost money.
 - h. Not gambling as a way to cope with emotional or physical pain.
 - i. Becoming educated about the warning signs of problem gambling.
- 3. All brochures and related material will be provided at various locations throughout the facility (locations set forth in the section titled *Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior*, in the section titled *Procedures for responding to patron requests for information* and in the section titled *Provision of printed material to educate patrons about compulsive and problem gambling and to inform them about treatment services available*.

Procedures to Identify Patrons and Employees with Suspected or Known Compulsive and Problem Gambling Behavior.

Isle Philadelphia Manager, LLC educates all employees regarding signs, symptoms and procedures to be utilized to identify patrons and employees with suspected or known compulsive and problem gambling behavior pursuant to the compulsive and problem gambling plan training (Attachment XXX). Employees are trained to recognize some of the potential behavioral, verbal, social, legal, economic and emotional characteristics that

may indicate that a patron may have a gambling problem.

Employees of the Isle Philadelphia Manager, LLC will not diagnose an individual as having a gambling problem. Compulsive gambling is often referred to as a hidden addiction and therefore, identification of compulsive and problem gambling behavior may be difficult for non-mental health personnel. The inaccurate identification of compulsive and problem gambling can lead to faulty assumptions, violations of privacy, or possibly the assignment of an inaccurate stigmatizing label by a non-professional.

Procedures for employees to report suspected or identified compulsive or problem gamblers to a designated key employee or other supervisory employee.

Isle Philadelphia Manager, LLC educates all employees regarding procedures to report suspected compulsive or identified problem gamblers to designated key employees or other supervisory employees. Reporting by employees shall be oral reporting unless otherwise specified herein. All employees are required to keep the reporting of suspected or identified problem gamblers confidential. An identified problem gambler includes an individual on the self-exclusion list who has self-identified himself/herself as a problem gambler as set forth in the Request for Voluntary Self-Exclusion from Gaming Activities (Attachment XXX).

1. If any employee has identified a compulsive or problem gambler (the individual is on the self-exclusion list) he/she shall contact security immediately. Security will proceed pursuant to the procedures set forth in the section titled *Procedures to prevent self-excluded persons from gambling*.
2. If any employee suspects a patron has a gambling problem, he/she shall orally notify his/her supervisor immediately with specific concerns regarding the behavior exhibited or oral statements made. The report of concern to the supervisor should include (if possible) the patron's name and specific reasons for concern. The concern should not be entered into the player tracking system.
3. Employees should ask themselves, before reporting:
 - a. Am I concerned?
 - b. Are there security or service issues involved?
 - c. Is my concern based on statements?
 - d. How quickly should I report my concern?
4. Supervisors shall contact the Table Games Shift Manager (or Assistant) if the patron is in the table games area or contact the Slot Shift Manager if the patron is in the slot area.
5. The appropriate Shift Manager will evaluate the facts and circumstances presented and make a determination if the patron should be approached. If an approach is warranted, the appropriate Shift Manager shall casually approach the patron to assess the situation. If possible, inquire about the day, the weather or other "small talk." If the person seems receptive, attempt to suggest a conversation in a private setting. Express concern and offer alternatives for assistance such as written materials explaining self-exclusion, problem gambling brochures and problem gambling treatment and assistance resources (Attachments XXX, YYY and ZZZ) as set forth in the next section titled *Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior*. Always protect privacy of the patron.
6. If the person is not receptive, walk away.
7. If the appropriate Shift Manager is not comfortable approaching a patron or is uncertain whether the situation warrants patron contact, he/she should contact Director of Casino Operations who will follow the procedures set forth above.
8. Enter all known information into the Responsible Gaming Log Book located in the Security Office. This Log Book will be kept in a locked drawer in the Security Office.

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Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior.

Isle Philadelphia Manager, LLC will make available to all patrons printed material to inform patrons about compulsive and problem gambling, responsible gaming, the self-exclusion program and treatment options (Attachment XXX, YYY and ZZZ).

1. Isle Philadelphia Manager, LLC will post signage within 50 feet of each entrance and exit of the facility and on each ATM, cash dispensing and change machine within the facility as set forth in the section titled *Plans for posting signs* and as provided in Attachment XXX.
2. Isle Philadelphia Manager, LLC will provide the following information located at the Security Podium and Security Office (Attachments WWW, XXX, YYY and ZZZ), Host Office, Credit Booth and each Cashier Cage (Attachment XXX and YYY):
 - a. Responsible Gaming brochure
 - b. Compulsive and Problem Gambling brochure
 - c. Voluntary Credit Suspension Brochure
 - d. Self-Exclusion Program Brochure
 - e. Request for Voluntary Self-Exclusion form
 - f. Treatment provider list
 - g. Gamblers Anonymous Pennsylvania Directory
 - h. GAM-ANON Pennsylvania Directory
3. All employees will be familiar with the location of the information and will be able to direct patrons to the information.
4. The Table Games or Slot Shift Manager may provide the above referenced information pursuant to the section titled *Procedures for employees to report suspected or identified compulsive or problem gamblers to a designated key employee or other supervisory employee*.
5. On the backside of all Player Cards and on the backside of all ticket vouchers, Isle Philadelphia Manager, LLC will print the phrase "Gambling Problem? Call 1-800-GAMBLER" (Attachment XXX)

Procedures for responding to patron requests for information.

Isle Philadelphia Manager, LLC will provide or direct patrons to the location of printed material to inform patrons about compulsive and problem gambling, responsible gaming, the voluntary credit suspension program, the self-exclusion program and treatment options (Attachment XXX, YYY and ZZZ).

1. Isle Philadelphia Manager, LLC will provide the following information in displays located at Casino Security Podium and Security Office (Attachments WWW, XXX, YYY and ZZZ), Host Office, Credit Booth and each Cashier Cage (Attachment XXX and YYY):
 - a. Responsible Gaming brochure
 - b. Compulsive and Problem Gambling brochure
 - c. Voluntary Credit Suspension brochure
 - d. Self-Exclusion Program Brochure
 - e. Request for Voluntary Self-Exclusion form
 - f. Treatment provider list
 - g. Gamblers Anonymous Pennsylvania Directory
 - h. GAM-ANON Pennsylvania Directory
2. All employees will be familiar with the location of the information and will be able to direct patrons to the information.

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3. All employees should be able to refer patrons to the information on the backside of all Player Cards which provides the phrase "Gambling Problem? Call 1-800-GAMBLER" (Attachment XXX)
4. Requests for information should never be entered into the CMS player tracking system.

Procedures to keep the identity of an individual suspected of problem gambling confidential.

All employees are required to keep the identity of an individual suspected of problem gambling confidential.

1. Except for the procedures set forth in the section titled *Procedures for employees to report suspected or identified compulsive or problem gamblers to a designated key employee or other supervisory employee* and the section titled *Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior* employees shall not discuss or disclose the identity of an individual that he or she suspects has a gambling problem.
2. Employees may discuss the identity of such individuals with their supervisor, security and Table Games or Slot Shift Manager, however the identity should never be discussed or disclosed to any other employee of Isle Philadelphia Manager, LLC or individual who is not one of the designated employees unless directed to do so by any of the above referenced individuals or a PGCB employee.

Provision of printed material to educate patrons about compulsive and problem gambling and to inform them about treatment services available.

Isle Philadelphia Manager, LLC will provide or direct patrons to the location of printed material to inform patrons about compulsive and problem gambling, responsible gaming, the voluntary credit suspension program, the self-exclusion program and treatment options (Attachment XXX, YYY and ZZZ) and will review and update the printed materials as necessary.

1. Isle Philadelphia Manager, LLC will post signage as set forth in the section titled *Plans for posting signs* and as provided in Attachment XXX.
2. Isle Philadelphia Manager, LLC will provide printed information located at Casino Security Podium and Security Office (Attachments XXX, YYY and ZZZ), Player's Club Booth and each Cashier Cage (Attachment XXX).
3. On the website and on all marketing or advertising materials that are offered to the general public, including signs, billboards, print, radio and television, Isle Philadelphia Manager, LLC will print and/or provide the phrase "If you, or someone you know has a gambling problem, help is available. Call 1-800-GAMBLER" (Attachment XXX).

List of community, public and private treatment services.

Isle Philadelphia Manager, LLC will provide or direct patrons to the location of printed material to inform patrons about treatment options (Attachment ZZZ) and will review and update the printed materials as necessary. Providing this list *does not* create a duty for Isle Philadelphia Manager, LLC or its employees to refer compulsive and problem gamblers to qualified treatment professionals.

1. Isle Philadelphia Manager, LLC will provide the list of community, public and private treatment services pursuant to the section titled *Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior*, the section titled *Provision of printed material to educate patrons about compulsive and problem gambling and to inform them about treatment services available* and upon request.

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2. Isle Philadelphia Manager, LLC will provide information in display cases located at Casino Security Podium and Security Office (Attachments XXX, YYY and ZZZ), Host Office and each Cashier Cage (Attachment XXX).

Certification process to verify that each employee has completed the required training and annual reinforcement training

Isle Philadelphia Manager, LLC will educate all employees regarding compulsive and problem gambling, the prohibition of underage gambling, the prohibition of gambling by intoxicated patrons, and the identification and ejection of excluded and self-excluded persons. All employees of Isle Philadelphia Manager, LLC will be trained in accordance with the employee training program (Attachment XXX). Appropriate employees, as specified herein, will be trained in the TIPS. (Attachment XXX). Employees of specific departments will be trained in departmental specific training regarding policies and procedures as set forth in this Plan.

1. Verification of attendance at training and annual reinforcement training regarding compulsive and problem gambling, the prohibition of underage gambling, the prohibition of gambling by intoxicated patrons and the identification and ejection of excluded and self-excluded persons will be demonstrated on "sign-in" and "sign-out" sheets which will be completed by the employee at the trainings (Attachment XXX). This record of training attendance will be kept on file in the Human Resources office.
2. Verification of TIPS or other approved program] training will be demonstrated pursuant to the TIPS certification process. This record of training attendance will be kept on file in the Human Resources office.
3. Verification of departmental specific training regarding policies and procedures as set forth in this Plan will be demonstrated on "sign-in" and "sign-out" sheets which will be completed by the employee at the trainings (Attachment XXX). This record of training attendance will be kept on file in the Human Resources Office.
4. Certificates of training completion, for initial and annual reinforcement trainings for compulsive, will include the employee's printed name above the following phrase; "For Completing the Compulsive Problem Gambling Training Program"
5. Additionally, the signature of Training Manager and the date of the training will be affixed to the certificate (Attachment XXX). The certificate of training completion will be awarded after verification of "sign-in," "sign-out" procedures and be kept in the employees personnel file.

Estimated cost for development, implementation and administration of the plan.

Isle Philadelphia Manager, LLC has developed, implemented and is administering this plan with an initial annual budget of \$ZZZ.

The Plan is provided with an initial annual budget of \$ZZZ to carry out the details as outlined herein. The cost of the Plan will include employee training, printing signage, printing brochures and literature, reinforcement training sessions, outside presenters as necessary, sponsorships/memberships, outreach and incidental fees associated with Plan. The estimated itemized list is as indicated:

- a. [INSERT ITEMIZED LIST AND ESTIMATED AND/OR ACTUAL COSTS]

Procedures to prevent underage gambling.

Persons under the age of twenty-one (21) ("underage") are prohibited from gambling, or traversing the gaming floor. Underage persons may transverse the gaming floor utilizing pathways that have been specifically excluded from the gaming floor, as approved by the Board, with an adult over the age of 21 and a security

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An individual 18 years of age or older employed by a slot machine licensee, a gaming service provider, the board or any other regulatory or emergency response agency is not considered to be underage while engaged in the performance of the individual's employment duties.

1. Isle Philadelphia Manager, LLC will prominently post signage within 50 feet of each entrance and exit of the gaming floor signage related to underage gambling as set forth in the section titled *Plans for posting signs* and as provided in Attachment XXX.
2. Prior to entering the gaming floor, all patrons who appear under the age of 30 will be asked, by security, patrons do not wish to be repeatedly asked to produce valid, legally acceptable government issued photo identification, they may elect to have their hand stamped [OR A BRACELET PLACED ON] by a security officer who has verified their age/identification. Rotating colored hand [OR DATE] stamps [OR ROTATING COLORED BRACELETS] will be placed on the individual, by the security officer, if requested by a patron who is of legal age to gamble and consume alcohol in the Commonwealth of Pennsylvania.
3. Legally acceptable government issued identification must include a photograph and date of birth:
 - a. A valid photo driver's license issued by the Pennsylvania Department of Transportation or any other state.
 - b. A valid photo identification issued by the Pennsylvania Department of Transportation or any other state.
 - c. A valid Armed Forces identification card that contains the holder's photograph.
 - d. A valid passport or visa, which contains the holder's photograph.
 - e. Any other form of valid government issued identification (Green Card, Merchant Marine Identification, foreign driver's license, etc., that has been verified in an identification book or database).
4. Security will not permit an individual, who appears under 30 years of age, to enter or transverse the gaming floor without having presented a valid, legally acceptable government issued photo identification that indicates that the individual is at least 21 years of age.
5. Any employee who suspects that an individual on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted and/or engaging in gaming activities is underage shall immediately notify the Security Supervisor who will enact the security procedures related to underage gambling as set forth in the Security Department duties and responsibilities below.
6. Specific departments have duties and responsibilities as set forth below:
 - a. **Security Department**-Security is responsible for the enforcement and reporting of operational efforts, which relate to the prevention and identification of underage gambling.
 - 1) Prior to entering the gaming floor or areas off the gaming floor where contests or tournaments are conducted, all patrons who appear under the age of 30 will be asked, by security officers, to produce valid, legally acceptable government issued photo identification, to verify their age/identification.
 - 2) Security will require all patrons who are on the gaming floor or areas off the gaming floor where contests or tournaments are conducted and who appear to be under the age of 30 to produce valid, legally acceptable government issued photo identification, to verify their age/identification.
 - 3) Upon identification by security, or notification by any employee, of an underage individual who is on the gaming floor, gambling or not, security officers will approach, engage, and verify the age of the patron in question by requesting legally acceptable government issued photo identification as outlined above.
 - 4) If the patron is underage, or cannot produce legally acceptable government issued photo identification, the security officer(s) will immediately contact the CCR on duty, Pennsylvania State Police (PSP) and surveillance. The underage individual will be escorted off the gaming floor by the

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security officer(s), PSP and/or the CCR. If the underage individual was engaging in gaming activities, security and/or the CCR on duty will facilitate "cash out" of the slot machine prior to initiation of the escort. The underage individual will be removed to the PGCB and/or PSP offices for processing. Security and/or the CCR on duty will confiscate all the winnings, and Security will document the amount and submit the confiscated winnings to the casino cage for safekeeping. Winnings will be remitted to the PGCB upon request.

- 5) The Security Supervisor may complete a formal eviction form for the individual who will be advised that subsequent violations will result in an arrest for trespass. The involved security officer(s) will document this event on an incident report and forward to Security Supervisor. The Security Supervisor will ensure that the incident report includes identification of all employees involved and the location of entry to the gaming floor, and will forward the report to Security Manager for review and signature, and the Security Manager ultimately forwards a copy of the report to the Regulatory Compliance Officer and Vice President/General Manager.
 - 6) The Security Manager or, in his/her absence, Security Supervisor, will notify the Director OCPG within 24 hours of the identification of an underage individual who has engaged in gaming activities.
- b. **Surveillance Department**-Surveillance is responsible for the electronic monitoring of all gaming areas, areas off the gaming floor where contests or tournaments are conducted and the food and beverage areas in the facility. The Surveillance Manager and surveillance personnel assigned to surveillance duties are responsible for monitoring these areas for patrons appearing to be underage who are on the gaming floor and/or are engaged in gaming activities.
- 1) Upon identification, or notification, of an individual suspected to be underage, the surveillance personnel shall notify the Security Supervisor who will enact the security procedures related to underage gambling as set forth above.
 - 2) Surveillance personnel will immediately track the individual on the gaming floor or areas off the gaming floor where contests or tournaments are conducted to advise CCR if the individual had engaged in gaming activities.
 - 3) The Surveillance Supervisor will document the incident and notification efforts on an incident report and will provide a copy of the surveillance tape/disc and timeline to the CCR with a copy of the incident report.
- c. **Slots Department**-Slot attendants are responsible for the visual monitoring of patron activity on the gaming floor. Slot attendants will verify the age of an individual by inspecting legally acceptable government issued photo identification prior to the payment of a W2-G issued hand paid jackpot to ensure that the individual is at least 21 years of age.
- 1) If any slot attendant identifies, or receives notification, of an individual who is on the gaming floor and/or engaged in gaming activities and is suspected to be underage, the slot attendant will immediately notify the Security Supervisor who will enact the security procedures related to underage gambling as set forth above.
 - 2) The Security Supervisor will document the incident and notification efforts on an incident report.
- d. **Table Games Department**-Table Games employees are responsible for the visual monitoring of patron activity on the gaming floor and areas off the gaming floor where contests or tournaments are conducted in an attempt to identify underage individuals and prevent underage gaming. Table Games employees are also responsible for verifying identification of individuals, who appear under 30, to ensure that an individual engaging in gaming activities is not underage. Should a Dealer suspect or question the legal age of a patron at his/her table, they will immediately call Table Games Supervisor. The Table Games Supervisor will verify the identification of the patron.
- 1) If a Table Games Supervisor identifies, or receives notification, of an individual who is on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted and/or

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engaged in gaming activities and is suspected to be underage, the employee will immediately notify the Security Supervisor who will enact the security procedures related to underage gambling as set forth above.

- 2) The Security Supervisor will document the incident and notification efforts on an incident report.
- c. **Credit Department**-Credit Department is responsible for ensuring that individuals who are underage do not receive credit.
 - 1) If a patron cannot produce legally acceptable government issued photo identification showing proof of age, the Credit Department employee will not proceed with the creation of a signature file or preparation or increase of a credit limit and will immediately notify the Security Supervisor.
 - 2) If the Security Supervisor is unable verify the age of the individual, he/she will enact the security procedures related to underage gambling as set forth above.
- f. **Cashier's Cage**-All cage cashiers will request legally acceptable government issued photo identification as proof of age and will check the identification against the player tracking system prior to processing check cashing privileges, cashing of gift certificates/cards, customer deposits, creation of signature file, preparation or increase of a credit limit.
 - 1) If a patron cannot produce legally acceptable government issued photo identification showing proof of age, the cashier will not proceed with the transaction and will immediately notify the Cage Supervisor.
 - 2) If the Cage Supervisor is unable verify the age of the individual, he/she will notify the Security Supervisor who will enact the security procedures related to underage gambling as set forth above.
 - 3) The Cage Supervisor will issue a receipt for confiscated winnings, redeem any vouchers that were confiscated (and retain copies of the vouchers) and will provide safekeeping of the redeemed winnings until the PGCB requests remittance.
 - 4) The Security Supervisor will document the incident and notification efforts of the Cage on an incident report.
- g. **Marketing Department**- Marketing personnel require legally acceptable government issued, photo identification prior to registering an individual in the player tracking system and issuing a Player's Club Card. A Player's Club Card will not be issued to an individual under 21. Only Player's Club members will be eligible for promotions, complimentary services, awards and drawings and targeted mailings.
 - 1) At the time of Player's Club registration, a patron must provide legally acceptable government issued photo identification, sign the back of the card and establish a PIN number for their individual subsequent use. Since the Player's Club card number and PIN number are integrated into the player tracking system, no self-redemption can occur without the use of a valid card and the PIN number.
 - 2) In addition, individuals under the age of 21 are precluded from accessing the gaming floor without a Security escort, and will not be permitted to use the self-redemption kiosks or any gaming device.
 - 3) Only valid Player's Club members will be eligible for promotions and targeted mailings. No complimentary services or other like benefits will be provided to an individual without valid government issued photo identification showing proof of age.
 - 4) Upon identification, or notification of an individual suspected to be under 21, marketing personnel will immediately notify the Player's Club Supervisor, who will notify the Security Supervisor who will enact the security procedures related to underage gambling as set forth above.
 - 5) The Security Supervisor will document the incident and notification efforts on an incident report.
- h. **Food and Beverage Department**-Although security officers will be asking anyone who appears to be 30 years or age or under for identification, food and beverage staff who have patron contact may challenge any patron, whether on or off the gaming floor, attempting to purchase alcohol. In addition, food and beverage staff who have patron contact will notify a Security Supervisor if a patron appears to be under 21 years of age (as set forth in TIPS training materials, Attachment XXX) and is on the gaming floor or

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consuming or attempting to consume alcohol. Food and beverage personnel with patron contact will notify Security Supervisor who will enact the security procedures related to underage gambling as set forth above. The Security Supervisor will document the incident and notification efforts on an incident report.

Procedures to prevent excluded persons from gambling.

Isle Philadelphia Manager, LLC prohibits excluded persons from gambling.

1. Isle Philadelphia Manager, LLC shall maintain electronic and hard copies of the most current version of the Exclusion List published by the PGCB and distribute to the appropriate personnel. The list distribution and appropriate personnel include the following:
 - a. Receipt of the list, as well as additions, deletions, changes and other updates, is acknowledged by the Regulatory Compliance Officer to the CCR.
 - b. The Regulatory Compliance Officer, within 3 business days of receipt of the list, disperses the list and additions, deletions, changes and other updates to: Database Manager, Surveillance Manager, Security Manager, Cage Manager Casino Manager and Player Development Manager. Database Manager, Surveillance Manager, Security Manager, Cage Manager Casino Manager and Player Development Manager are responsible for ensuring all members of their respective departments review the information and photographs of the Excluded persons at least weekly to become familiar with the appearance and physical description of each excluded person.
2. A hard copy of the exclusion list is kept at all security podiums, the Security Office, Surveillance Room, Cashiers Cage, Employee Window and the Host's Office. Employees of Security and Surveillance will review the information and photographs of the Excluded persons at a minimum, weekly, to become familiar with the appearance, identity and physical description of each excluded person.
3. Excluded persons, who have been identified by the PGCB and placed on the list, will have their names and brief physical descriptions entered on the player tracking system by the Database Manager within 5 business days after the day notice is mailed or transmitted electronically to Isle Philadelphia Manager, LLC. If no player tracking system account exists for an individual on the exclusion list, the Database Manager will create an account and will simultaneously "flag" and disable the new account within 5 business days after the day notice is mailed or transmitted electronically to Isle Philadelphia Manager, LLC. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at Isle Philadelphia Manager, LLC will be deleted, and the individual will not be permitted to redeem them or to participate in any bonuses, awards or promotions.
4. Any employee who suspects that an individual is on the Exclusion List, or is a person known to satisfy the criteria of a-d below, shall immediately notify the Security Supervisor who will enact the security procedures related to Excluded Persons as set forth below.
5. The Vice President/General Manager shall inform the BIE, in writing, of the names of persons that Isle Philadelphia Manager, LLC believes are appropriate for placement on the exclusion list or a person who has been excluded or ejected because they meet one or more of the following criteria, and the reason for placement on the list:
 - a. A career or professional offender whose presence in a licensed facility would, in the opinion of the Board, be inimical to the interest of the Commonwealth or of licensed gaming therein, or both.
 - b. An individual with a known relationship or connection with a career or professional offender whose presence in a licensed facility would be inimical to the interest of the Commonwealth or of licensed gaming therein, or both.
 - c. A person who has been convicted of a criminal offense under the laws of any state, or of the United States, which is punishable by more than 1 year in prison, or who has been convicted of any crime or

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offense involving moral turpitude, and whose presence in a licensed facility would be inimical to the interest of the Commonwealth or of licensed gaming therein, or both.

- d. A person whose presence in a licensed facility would be inimical to the interest of the Commonwealth or of licensed gaming therein, or both, including:
 - 1) Cheats.
 - 2) Persons whose gaming privileges have been suspended by the Board.
 - 3) Persons whose Board registrations, certifications, permits, licenses or other approvals have been revoked.
 - 4) Persons who pose a threat to the safety of the patrons or employees of a licensed gaming entity.
 - 5) Persons with a history of conduct involving the disruption of the gaming operations within a licensed facility.
 - 6) Persons subject to an order of a court of competent jurisdiction in this Commonwealth excluding those persons from licensed facilities.
 - 7) Persons with pending charges or indictments for a gaming or gambling crime or a crime related to the integrity of gaming operations in this Commonwealth or another jurisdiction.
 - 8) Persons who have been convicted of a gaming or gambling crime or crime related to the integrity of gaming operations in this Commonwealth or another jurisdiction.
 - 9) Persons who have performed an act or have a notorious or unsavory reputation that would adversely affect public confidence and trust in gaming, including, being identified with criminal activities in published reports of various Federal and State legislative and executive bodies that have inquired into criminal or organized criminal activities.
6. Specific departments have duties and responsibilities as set forth below:
 - a. **Security Department-** Upon notification or visual identification (e.g., via video surveillance or in-vivo) of a person suspected to be on the exclusion list, security officers will immediately contact the Security Supervisor for comparison and consultation of physical features/photographs consistent with those identified on the hard copy of the exclusion list published by the PGCB and entered into the player tracking system. If a comparison match is indicated, the Security Supervisor will verify the identification of the individual and will immediately contact the CCR on duty and surveillance. The individual will be escorted off the gaming floor by Security and/or the CCR. If the individual was engaging in gaming activities, security and/or the CCR on duty will facilitate "cash out" of the slot machine prior to initiation the escort. The individual will be removed to the PGCB offices for processing. Security and/or the CCR on duty will confiscate all the winnings, and Security will document the amount and submit the confiscated winnings to the casino cage for safekeeping. Winnings will be remitted to the PGCB upon request.
 - 1) The Security Supervisor will complete a formal eviction form for the individual and will be advised that subsequent violations will result in an arrest for trespass.
 - 2) The involved security officer(s) will document this event on the incident report and forward to Security Supervisor.
 - 3) The Security Supervisor will ensure that the incident report includes identification of all employees involved and the location of entry to the gaming floor, and will forward the report to Security Manager for review and signature, and the Security Manager ultimately forwards a copy of the report to the Regulatory Compliance Officer and the Vice President/General Manager.
 - 4) The Security Supervisor will complete the necessary reports, logbooks, and paperwork within one hour of the incident, or within one hour of their return to work. However, in no case shall the completion and forwarding of the details of the incident to the Security Supervisor be greater than eight (8) hours from the occurrence of the incident.
 - 5) The Security Manager, or, in his absence, the Security Supervisor, will notify the Director of OCPG

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within 24 hours.

- b. **Surveillance Department**- Surveillance personnel are responsible for the electronic monitoring of all gaming areas, areas off the gaming floor where contests or tournaments are conducted and food and beverage areas in the facility. Surveillance will maintain a hard copy of the Exclusion list in the Surveillance room. The Surveillance Supervisor and surveillance personnel assigned to surveillance duties are responsible for becoming familiar with the photographs of the excluded persons and for monitoring these areas for excluded persons.
 - 1) Upon identification, or notification, of an individual suspected to be on the Exclusion List, the Surveillance personnel shall notify the Security Supervisor who will enact the security procedures related to excluded persons as set forth above.
 - 2) Surveillance personnel will immediately track the individual on the gaming floor or in areas off the gaming floor where contests or tournaments are conducted to advise CCR if the individual had engaged in gaming activities.
 - 3) The Surveillance Supervisor will document the incident and notification efforts on an incident report and will provide a copy of the surveillance tape/disc and timeline to the CCR with a copy of the incident report.
- c. **Slots Department**-All slot attendants are responsible for the visual monitoring of patron activity on the casino floor. The Slots Department will maintain current copies of the exclusion list in the Employee Window area. All Slots' department personnel will review the exclusion list on a weekly basis, prior to starting their shift. Slot attendants will verify the identity of an individual by inspecting legally acceptable government issued photo identification prior to the payment of a W2-G issued hand paid jackpot and will verify, through the player tracking system, to ensure that the individual is not flagged as being on the exclusion list.
 - 1) If any slot attendant identifies, or receives notification, of an individual who is on the gaming floor and/or engaged in gaming activities and is suspected to be on the exclusion list, the slot attendant will immediately notify the Slot Supervisor who will enact the security procedures related to excluded persons as set forth above.
 - 2) The Slot Supervisor will document the incident and notification efforts on an incident report.
- d. **Table Games Department**-Table Games employees are responsible for the visual monitoring of patron activity on the gaming floor and areas off the gaming floor where contests or tournaments are conducted in an attempt to identify excluded individuals.
 - 1) If a Table Games employee identifies, or receives notification, of an individual who is on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted and/or engaged in gaming activities and is suspected to be on the exclusion list, the employee will immediately notify the Table Games Supervisor who will enact the security procedures related to excluded persons as set forth above.
 - 2) The Table Games Supervisor will document the incident and notification efforts on an incident report.
- e. **Credit Department**-Credit Department is responsible for ensuring that individuals who are on the exclusion list do not receive credit.
 - 1) If a patron cannot produce legally acceptable government issued photo identification, or if the individual is flagged as an excluded person in the player tracking system, the Credit Department employee will not proceed with the creation of a signature file or preparation or increase of a credit limit and will immediately notify the Security Supervisor.
- f. **Cashier's Cage/Player's Club**- All cage cashiers will request legally acceptable government issued photo identification and will check the identification against the player tracking system prior to issuing a Player's Club Card, processing check cashing privileges, cashing of gift certificates/cards, customer deposits, creation of signature file, preparation or increase of a credit limit and the preparation of jackpot

payout slips.

- 1) If a patron cannot produce legally acceptable government issued photo identification, or if the individual is flagged as an excluded person in the player tracking system, the cashier will not proceed with the transaction and will immediately notify the Cage Supervisor.
- 2) The Cage Supervisor will notify Security Supervisor who will enact the security procedures related to excluded persons as set forth above.
- 3) The Cage Supervisor will issue a receipt for confiscated winnings, redeem any vouchers that were confiscated (and retain copies of the vouchers) and will provide safekeeping of the redeemed winnings until the PGCB requests remittance.
- 4) The Cage Supervisor will document the incident and notification efforts of the Cage on an incident report.

g. **Marketing Department-** Excluded persons, who have been identified by the PGCB and placed on the list, will have their names and brief physical descriptions entered on the CMS player tracking system by the Database Manager within 5 business days after the day notice is mailed or transmitted electronically to Isle Philadelphia Manager, LLC. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at Isle Philadelphia Manager, LLC will be deleted, and the individual will not be permitted to redeem them and the individual will not be permitted to redeem them or to participate in any bonuses, awards or promotions.

- 1) Marketing personnel require legally acceptable government issued photo identification prior to registering an individual in the player tracking system and issuing a Player's Club Card. The government issued photo identification will be scanned into the player tracking system
- 2) A Player's Club Card will not be issued to an individual who is flagged in the player tracking system as being excluded.
- 3) Only valid Player's Club members will be eligible for promotions and targeted mailings. No complimentary services or other like benefits will be provided to an individual without valid government issued photo identification.
- 4) Upon identification, or notification of an individual suspected to be on the exclusion list, marketing personnel will immediately notify the Security Supervisor, who will enact the security procedures related to excluded persons as set forth above.
- 5) The Security Supervisor will document the incident and notification efforts on an incident report.
- 6) The Marketing department will maintain current copies of the exclusion list in the Host office. All Marketing personnel will review the exclusion list on weekly basis.

Procedures to prevent self-excluded persons from gambling.

Isle Philadelphia Manager, LLC prohibits self-excluded persons from gambling. It is the policy of all properties owned or operated by Isle of Capri inc. that any self-exclusion will be considered company-wide. Additionally, any such exclusion will be considered a life time ban. The following applies to persons who have placed themselves on the PGCB self-exclusion list only. All non-Pennsylvania exclusions will be properly trespassed and escorted from the casino.

1. Isle Philadelphia Manager, LLC will post signage at all entrances to its facility indicating that a person who is on the self-exclusion list will be subject to arrest for trespassing under 18 Pa.C.S. § 3503 (relating to criminal trespass) if the person is on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted or engaging in gaming activities as set forth in the section titled *Plans for posting signs within the facility* and as provided in Attachment XXX.
2. The prohibition against allowing self-excluded persons on the gaming floor or in areas off the gaming floor where contests or tournaments are conducted does not apply to an individual who is on the self-exclusion

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list if all of the following apply:

- a. The individual is carrying out the duties of employment or incidental activities related to employment,
 - b. Isle Philadelphia Manager, LLC's security department and the PGCB have received prior notice,
 - c. Access to the gaming floor or areas off the gaming floor where contests or tournaments are conducted is limited to the time necessary to complete the individual's assigned duties, and
 - d. The individual does not otherwise engage in any gaming activities.
3. The PGCB maintains the official self-exclusion list and notifies Isle Philadelphia Manager, LLC of additions, deletions, changes and other updates to the list by first class mail or electronically. The notice provided by the PGCB will include the following information concerning a person who has been added to the self-exclusion list:
- a. Name, including any aliases or nicknames.
 - b. Date of birth.
 - c. Address of current residence.
 - d. Telephone number.
 - e. Social Security number, when voluntarily provided by the person requesting self-exclusion.
 - f. Physical description of the person, including height, weight, gender, hair color, eye color and other physical characteristics that may assist in the identification of the person.
 - g. A copy of the photograph taken by the PGCB.
 - h. The notice provided to slot machine licensees by the PGCB concerning a person whose name has been removed from the self-exclusion list will include the name and date of birth of the person.
4. Isle Philadelphia Manager, LLC shall maintain electronic and hard copies of the self-exclusion list provided by the PGCB and distribute to the appropriate personnel, and shall maintain electronic and hard copies of the list of individuals whose name has been removed from the self-exclusion list. **Any patron that has self-excluded in Pennsylvania will be considered a lifetime ban at Isle Philadelphia Manager, LLC and all properties owned and operated by Isle of Casino inc. and will not be removed from the CMS player tracking system.**

The list distribution and appropriate personnel include the following:

- a. Receipt of the list, as well as additions, deletions, changes and other updates, is acknowledged by Regulatory Compliance Officer to the CCR.
 - b. The Regulatory Compliance Officer disperses the list and additions, deletions or other updates to the list within 3 business days of receipt of the list and updates from the PGCB to: Database Manager, Surveillance Manager, Security Manager, Cage Manager, Casino Manager and Player Development Manager. Database Manager, Surveillance Manager, Security Manager, Cage Manager, Casino Manager and Player Development Manager are responsible for ensuring all of their respective departments review the information and photographs of the self-excluded persons at least weekly to become familiar with the appearance and physical description of each self-excluded person.
 - c. Employees are required to keep the identity of an individual on the self-exclusion list confidential.
5. A hard copy of the self-exclusion list is kept at all security podiums, the Security Office, Surveillance Room. Employees of Security and Surveillance will review the information and photographs of the self-excluded persons at a minimum, weekly, to become familiar with the appearance, identity and physical description of each self-excluded person.
6. The Database Manager will "flag" and disable the player tracking system membership of a self-excluded individual within 5 business days after the day notice is mailed or transmitted electronically to Isle Philadelphia Manager, LLC. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at Isle Philadelphia Manager, LLC will be deleted, and the individual will not be permitted to redeem them. If no player tracking system membership exists for an individual on the self-exclusion list, the Database Manager will create an account and will simultaneously "flag" and disable the new account within 5 business days after the day notice is mailed or transmitted

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electronically to Isle Philadelphia Manager, LLC.

7. Any patron that has self-excluded in Pennsylvania will be considered a lifetime ban at Isle Philadelphia Manager, LLC and all properties owned and operated by Isle of Casino inc. and will not be removed from the CMS player tracking system.
8. Employees will disseminate written materials to patrons explaining the self-exclusion program as set forth in the section titled *Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior* and the section titled *Procedures for responding to patron requests for information*.
9. Employees should direct an individual inquiring about self-exclusion to Security. Security DOES NOT do the intake, but should explain the highlights of the program (Security should be familiar with the FAQs of self-exclusion as set forth in the state's Self-Exclusion brochure). Security should contact the CCR on duty, or Director of OCPG, to make an appointment for the self-exclusion intake if the individual wants to request voluntary self-exclusion. Security should provide copies of the Forms to the individual. All contact with employees and security is to be kept confidential.
10. Specific departments have duties and responsibilities for which they will be trained as set forth below:
 - a. **Security Department-** Upon notification or visual identification (e.g., via video surveillance or in-vivo) of a person suspected to be on the self exclusion list, security officers will immediately contact the Security Supervisor for comparison and consultation of physical features/photographs consistent with those identified on the hard copy of the self exclusion list published by the PGCB and entered into the player tracking system. If a comparison match is indicated, the Security Supervisor will verify the identification of the individual and will immediately contact the CCR on duty, Pennsylvania State Police and Surveillance. The individual will be escorted off the gaming floor by security and/or the CCR and the Pennsylvania State Police. If the individual was engaging in gaming activities, security and/or the CCR on duty will facilitate a "cash out" of the slot machine prior to initiation the escort. The individual will be removed to the PGCB offices or the offices of the Pennsylvania State Police for processing (including arrest for trespass pursuant to 18 Pa.C.S. 3503). Security and/or the CCR on duty will confiscate all the winnings and security will document the amount and submit the confiscated winnings to the casino cage for safekeeping. Winnings will be remitted to the PGCB upon request.
 - 1) The involved security officer(s) will document this event on an incident report and forward to Security Supervisor.
 - 2) The Security Supervisor will ensure that the incident report includes identification of all employees involved and the location of entry to the gaming floor, and will forward the report to the Security Manager for review and signature, and the Security Manager ultimately forwards a copy of the report to the Regulatory Compliance Officer and the Vice President/General Manager.
 - 3) The Security Supervisor will complete the necessary reports, logbooks, and paperwork within one hour of the incident, or within one hour of their return to work. However, in no case shall the completion and forwarding of the details of the incident to the Security Supervisor be greater than eight (8) hours from the occurrence of the incident.
 - 4) The Security Manager, or, in his absence, the Security supervisor, will notify the Director of OCPG within 24 hours of the incident.
 - b. **Surveillance Department-** Surveillance is responsible for the electronic monitoring of all gaming areas, areas off the gaming floor where contests or tournaments are conducted and the food and beverage areas in the facility. The Surveillance Manager and surveillance personnel assigned to surveillance duties are responsible for becoming familiar with the photographs of the self-excluded persons and for monitoring the abovementioned areas for self-excluded persons.
 - 1) Upon identification, or notification, of an individual suspected to be on the Self-Exclusion List, the Surveillance personnel shall notify the Security Supervisor who will enact the security procedures related to self-excluded persons as set forth above.

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- 2) Surveillance personnel will immediately track the individual on the gaming floor or areas off the gaming floor where contests or tournaments are conducted to advise CCR if the individual had engaged in gaming activities.
- 3) The Surveillance Supervisor will document the incident and notification efforts on an incident report and will provide a copy of the surveillance tape/disc and timeline to the CCR with a copy of the incident report.
- c. **Slots Department-**All slot attendants are responsible for the visual monitoring of patron activity on the gaming floor. Slot attendants will verify the identity of an individual by inspecting legally acceptable government issued photo identification prior to the payment of a W2-G issued hand paid jackpot and will verify, through the player tracking system, to ensure that the individual is not flagged as being on the self-exclusion list.
 - 1) If any slot attendant identifies, or receives notification, of an individual who is on the gaming floor and/or engaged in gaming activities and is suspected to be on the self-exclusion list, the slot attendant will immediately notify the Slot Supervisor who will enact the security procedures related to self-excluded persons as set forth above.
 - 2) The Slot Supervisor will document the incident and notification efforts on an incident report.
- d. **Table Games Department-**Table Games employees are responsible for the visual monitoring of patron activity on the gaming floor and areas off the gaming floor where contests or tournaments are conducted in an attempt to identify self-excluded individuals.
 - 1) If a Table Games employee identifies, or receives notification, of an individual who is on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted and/or engaged in gaming activities and is suspected to be on the self-exclusion list, the employee will immediately notify the Table Games Supervisor who will enact the security procedures related to self-excluded persons as set forth above.
 - 2) The Table Games Supervisor will document the incident and notification efforts on an incident report.
- e. **Credit Department-**Credit Department is responsible for ensuring that individuals who are on the self-exclusion list do not receive credit.
 - 1) If a patron cannot produce legally acceptable government issued photo identification, or if the individual is flagged as a self-excluded person in the player tracking system, the Credit Department employee will not proceed with the creation of a signature file or preparation or increase of a credit limit and will immediately notify the Security Supervisor.
- f. **Cashier's Cage-** All cage cashiers will request legally acceptable government issued photo identification and will check the identification against the player tracking system prior to issuing Player's Club cards, processing check cashing privileges, cashing of gift certificates/cards, customer deposits, creation of signature file, preparation or increase of a credit limit and the preparation of jackpot payout slips.
 - 1) If a patron cannot produce legally acceptable government issued photo identification, or if the individual is flagged as a self-excluded person in the player tracking system, the cashier will not proceed with the transaction and will immediately notify the Cage Supervisor.
 - 2) The Cage Supervisor will notify Security Supervisor who will enact the security procedures related to self-excluded persons as set forth above.
 - 3) The Cage Supervisor will issue a receipt for confiscated winnings, redeem any vouchers that were confiscated (and retain copies of the vouchers) and will provide safekeeping of the redeemed winnings until the PGCB requests remittance.
 - 4) The Cage Supervisor will document the incident and notification efforts of the Cage on an incident report.
- g. **Marketing Department-** Individuals who are on the self-exclusion list will have their names and brief physical descriptions entered on the player tracking system by the Database manager within 5 business

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days after the day notice is mailed or transmitted electronically to Isle Philadelphia Manager, LLC. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at Isle Philadelphia Manager, LLC will be deleted, and the individual will not be permitted to redeem them and the individual will not be permitted to redeem them or to participate in any bonuses, awards or promotions.

- 1) Marketing personnel require legally acceptable government issued photo identification prior to registering an individual in the player tracking system and issuing a Player's Club Card.
- 2) A Player's Club Card will not be issued to an individual who is flagged in the player tracking system as being self-excluded.
- 3) Only valid Player's Club members will be eligible for promotions and targeted mailings. No complimentary services or other like benefits will be provided to an individual without valid government issued photo identification.
- 4) Upon identification, or notification of an individual suspected to be on the self-exclusion list, marketing personnel will immediately notify the Security Supervisor, who will enact the security procedures related to self-excluded persons as set forth above.
- 5) The Security Supervisor will document the incident and notification efforts on an incident report.

Procedures to prevent intoxicated patrons from engaging in gaming activities.

Isle Philadelphia Manager, LLC will prevent intoxicated patrons from engaging in gaming activities and will assist in arranging food and a safe departure or accommodations.

1. Isle Philadelphia Manager, LLC has trained its Security and Food and Beverage employees who have patron contact in TIPS as set forth in the policy titled *Commitment to train employees and annual reinforcement training* which includes procedures designed to prevent serving alcohol to visibly intoxicated gaming patrons and has established these procedures designed to prevent persons from gaming after having been determined to be visibly intoxicated.
2. Visibly intoxicated patrons will be denied entry to the gaming floor and areas off the gaming floor where contests or tournaments are conducted by security officers stationed at gaming floor entry to prevent the patron from engaging in gaming activities and from entry to the gaming floor and areas off the gaming floor where contests or tournaments are conducted. The procedures outlined below will be followed to ensure that the intoxicated patron is provided with food and safe transportation or accommodations.
3. Specific departments have duties and responsibilities as set forth below:
 - a. **Security Department**-Upon visual observation or notification of any patron identified, or suspected to be visibly intoxicated, the security officer will notify Surveillance to dispatch additional security officers to assist in approaching the patron. Security officer(s) shall approach the patron, perform a status check, and make a determination if the patron appears to be visibly intoxicated (as set forth in TIPS training materials, Attachment XXX).
 - 1) If the security officer or Security Supervisor determines the patron is visibly intoxicated, the security officer or Security Supervisor will explain to the patron they appear to be visibly intoxicated and advise the patron they are not be permitted to enter the gaming floor or areas off the gaming floor where contests or tournaments are conducted, or if located on the gaming floor or areas off the gaming floor where contests or tournaments are conducted, stop drinking. The security officer or Security Supervisor will remove the patron from the gaming floor to prevent the intoxicated patron from engaging in gaming activities. Any unfinished alcoholic beverage will be removed from the intoxicated patron to prevent any further consumption of alcohol. The security officer or Security Supervisor will assist the patron and suggest the patron visit a restaurant and/or take a break.

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- 2) Security shall remain with the intoxicated patron until arrangements for their safe departure have been secured. If the patron refuses to give up their alcoholic beverage, refuses to leave the gaming floor or becomes unduly disruptive, the security officers will notify the PSP assigned to Isle Philadelphia Manager, LLC for further handling of the patron. If the intoxicated patron is interested in leaving the facility, security department personnel shall discuss with the patron driving arrangements, or overnight accommodations. If the patron attempts to leave the facility intoxicated, the Security Supervisor or Surveillance personnel will immediately notify PSP.
 - 3) If the patron has valet parked their vehicle, the car will not be returned to them until satisfactory and safe travel arrangements have been made.
 - 4) Security Supervisor shall document the incident and interventions provided to the intoxicated patron on an incident report.
- b. **Surveillance Department**-Upon visual observation of a patron who appears to be visibly intoxicated, Surveillance personnel assigned to surveillance duties shall immediately contact Security Supervisor to engage the procedures as set forth above. The surveillance personnel assigned to surveillance duties will document the incident and notification efforts on an incident report.
 - c. **Slots Department**-Upon observation of a patron who appears to be visibly intoxicated, slot attendants will immediately notify Slot Supervisor. The Slot Supervisor shall contact Surveillance so that Security will enact the procedures as set forth above. The Slot Supervisor will document the incident and notification efforts on an incident report.
 - d. **Table Games Department**- Upon observation of a patron who appears to be visibly intoxicated, table games employees will immediately notify a Table Games Supervisor. The Table Games Supervisor will enact the procedures as set forth above. The Table Games Supervisor will document the incident and notification efforts on an incident report.
 - e. **Credit Department**- Upon observation of a patron who appears to be visibly intoxicated, Credit Department employees will immediately notify a Security Supervisor. The Security Supervisor will enact the procedures as set forth above. The Security Supervisor will document the incident and notification efforts on an incident report.
 - f. **Food and Beverage Department**-Although security officers will be asking anyone who appears to be 30 years or age or under for identification, food and beverage staff who have patron contact have the right to challenge any patron attempting to purchase alcohol. In addition, food and beverage staff who have patron contact will notify a Security Supervisor if a patron appears to be visibly intoxicated (as set forth in TIPS training materials, Attachment XXX). Food and beverage personnel with patron contact will notify Lone Wolf Supervisors for alcohol service suspension/refusal of service once they have determined a patron is showing signs of intoxication and service to the patron has been suspended. Security officer(s) will assist in the suspension of service with Lone Wolf Supervisors. They will inform the patron of Pennsylvania State Liquor laws and security will enact the procedures as set forth above. The Security Supervisor will document the incident and notification efforts on an incident report.
 - g. **Valet Department**-Valet personnel with patron contact will notify the Valet/Transportation Supervisor if they suspect that a patron is intoxicated and attempts to obtain their car to leave the facility. The Valet/Transportation Supervisor will notify Security to enact the procedures set forth above. Security officer(s) will assist in the refusal to return a parked car to an intoxicated patron. The Security Supervisor will document the incident and notification efforts on an incident report.

Procedures to ensure that certain individuals may not obtain credit

Isle Philadelphia Manager, LLC offers credit at its licensed facility. In order to ensure that individuals on the Voluntary Credit Suspension List ("VCS List") do not obtain credit, Lady Luck Nemacolin instituted the

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following procedures.

1. A PGCB casino compliance representative ("CCR") will provide the Regulatory Compliance Officer or, in his or her absence, Regulatory Compliance Clerk with the advisories of patrons who have requested Voluntary Credit Suspension. Regulatory Compliance Officer or, in his or her absence, Regulatory Compliance Clerk will, within 24 hours, forward the advisory to the Credit Department for processing.
2. The Credit Department will maintain a copy of the VCS List and will ensure that the copy of the list is updated within 24 hours after Isle Philadelphia Manager, LLC receives the update(s) from the PGCB. The Credit Department will immediately suspend the credit privileges of any individual upon receipt of notice that the individual has been added to the voluntary credit suspension list.
3. A member of the Credit Department will check the player tracking system for the patron's account and will flag the account to denote credit suspension. As a result, this patron can no longer receive credit from Isle Philadelphia Manager, LLC. If the patron does not have an account with Isle Philadelphia Manager, LLC, a member of the Credit Department will create a credit account for that patron in the player tracking system and will flag the account to denote the credit suspension.
4. A member of the Credit Department will also manually fill out a Voluntary Credit Suspension / Removal Form. The Voluntary Credit Suspension / Removal Form will be filed in the patron's credit file if that patron has a credit account with Isle Philadelphia Manager, LLC. If the patron does not have a credit account, the Voluntary Credit Suspension / Removal Form will be attached to Isle Philadelphia Manager, LLC's VCS List with the advisory received from the PGCB.
5. A CCR will provide the Regulatory Compliance Officer or, in his or her absence, Regulatory Compliance Clerk with the advisories of patrons who have been removed from Voluntary Credit Suspension. Regulatory Compliance Officer or, in his or her absence, Regulatory Compliance Clerk will forward the removal advisory to the Credit Department for processing within 2 business days of receipt.
6. A member of the Credit Department will remove the patron from all Isle Philadelphia Manager, LLC's copies of the VCS List within 3 business days of receipt from the PGCB.
7. A member of the Credit Department will obtain the hard copy of the patron's credit file and re-verify the
8. A member of the Credit Department will sign the Voluntary Credit Suspension / Removal Form, including the date and time of removal.
9. A member of the Credit Department will eliminate the credit suspension flag on the patron's account in the player tracking system. If the account in the player tracking system was created for the purpose of designating the person as on the VCS List, the player's account will be deleted.
10. A hard copy of the Removal from Voluntary Credit Suspension advisory will be placed in the patron's credit file if they have an account with Isle Philadelphia Manager, LLC or in a separate designate Removal file if the patron has no credit account at Isle Philadelphia Manager, LLC.
11. The VSC List will be posted in the Credit Department and Casino Cage.

Details of outreach program(s) offered to employees and other individuals

Isle Philadelphia Manager, LLC offers Ceridian LifeWorks Employee Assistance Program (EAP) outreach programs to its employees which includes the following:

- Live phone access to master level staff clinicians, 24 hours/365 days a year for information, assessment, action planning, crisis intervention assistance, short-term problem resolution and referrals.
- Unlimited 24 hour telephonic consultations.
- Three face-to-face sessions per issue for assessment and short-term problem resolution. No limit to the number of issues per year.
- National network of licensed EAP counselors who perform face-to-face assessments and short-term problem resolution sessions. All EAP providers possess a master's degree or higher, state licensure, EAP experience and five years or more of clinical experience.
- Multi-cultural call center in Florida with bilingual/bicultural consultants, educational materials and website.
- AT&T translator services and TDD/TTY services.
- Addiction & Recovery:
 - On-staff substance abuse specialists
 - Consultation regarding but not limited to drug and alcohol abuse, mandated referrals, drug-free workplace issues, eating disorders and gambling.
 - Drug test positive referrals and case management for 1 year.
 - Case management of employer-mandated substance abuse referrals. Case coordination including referral for assessment, referral for recommended assistance, compliance monitoring through primary treatment and status reports to designated company contact.
 - Referrals to treatment centers, individual counseling, self-help groups and community resources.
- Management Consultation Services:
 - 24/7 dedicated line for managers and supervisors. On-staff expertise regarding workplace concerns such as employee tardiness and absenteeism, disciplinary problems, employee performance and productivity, employees with substance abuse concerns, co-worker conflicts, workplace violence and managing virtual employees.
 - Management directed referrals and case management for 1 year.
- 24 hour access to registered nurses who can provide general health information and referrals to the appropriate level of self-care or medical care.

For a complete overview of the program, please refer to Attachment XXX.

Plan for posting approved signs in the facility and materials offered to the public

Isle Philadelphia Manager, LLC will post the required signage throughout the facility and on information offered to the public. Signage will convey information in plain clearly understandable language. The statements and font size are submitted for approval as Attachment XXX with this CPG Plan and the specific locations for the signs are set forth in Attachment XXX. For purposes of this section, the term "advertisement" means marketing materials including signs, billboards, print, radio and television advertisements, emails and

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any notice or communication to the public through broadcasting, publication, mailing or other means of dissemination. The Compliance Officer is responsible for reviewing all signs and materials offered to the public and for submitting signs and materials to the Director of OCPG for approval.

1. Isle Philadelphia Manager, LLC will post signs bearing the gambling assistance message, which is the phrase: ***If you or someone you know has a gambling problem, help is available. Call toll free 1-800-GAMBLER.*** The complete text of the sign is as set forth in Attachment XXX. The signs shall be prominently posted at the following locations:
 - a. within 50 feet of each entrance and exit
 - b. affixed to each ATM, cash dispensing and change machine in the facility (as set forth in Attachment XXX).
2. Isle Philadelphia Manager, LLC will post the gambling assistance message, ***"If you or someone you know has a gambling problem, help is available. Call toll free 1-800-GAMBLER"***, on placards in the gaming floor entrances.
3. Isle Philadelphia Manager, LLC will print the gambling assistance message; ***"If you or someone you know has a gambling problem, help is available. Call toll free 1-800-GAMBLER"***. Or ***"Gambling Problem? Call 1-800-GAMBLER"***, on all marketing or advertising materials that are offered to the general public, including signs, billboards, print, radio and television advertisements.
4. Isle Philadelphia Manager, LLC will post signs at all entrances to the facility indicating that "A person who is on the self-exclusion list will be subject to arrest for trespassing under 18 Pa.C.S. § 3503 (relating to criminal trespass) if the person is on the gaming floor or engaging in gaming activities." (as set forth in Attachment XXX).
5. Isle Philadelphia Manager, LLC will post signs with the phrase "No person under the age of 21 is permitted on the casino floor." The signs will be prominently posted within 50 feet of each entrance and exit of the gaming floor.
6. Isle Philadelphia Manager, LLC advertisements will not use or depict individuals who appear to be under 21 years of age.
7. Isle Philadelphia Manager, LLC will discontinue as expeditiously as possible the use of a particular advertisement upon receipt of written notice from the Board that the Board has determined that the use of the particular advertisement in, or with respect to, this Commonwealth could adversely impact the public or the integrity of gaming.
8. Isle Philadelphia Manager, LLC advertisements will not (1) contain false or misleading information, (2) use a font, type size, location, lighting, illustration, graphic depiction or color obscuring any material fact or the gambling assistance message, or (3) fail to disclose any material conditions or limiting factors associated with the advertisement.
9. The height of the font used for the gambling assistance message in signs, direct mail marketing materials, posters and other print advertisements will be the greater of (1) at least the same size as the majority of the text used or (2) 2% of the height or width, whichever is greater, of the sign, direct mail marketing material, poster or other print advertisement.
10. The height of the font used for the gambling assistance message will be at least 5% of the height of the face of the billboard.
11. The height of the font used for the gambling assistance message for video and television advertisements will be at least 2% of the height of the image that will be displayed and will be visible for the entire time the video or television advertisement is displayed, unless a shorter time is approved by the Director of OCPG.
12. All advertisements on social media sites must include the gambling assistance message. This includes the gambling assistance message on the homepage and profile page of each social media site as well as on each advertisement posted to the social media site. The height of the font used for the gambling assistance

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message will be the greater of (1) at least the same size as the majority of the text used or (2) 2% of the height or width, whichever is greater, of the webpage or the advertisement posted to the social media site.

Other policies and procedures intended to be used beyond what is required

Isle Philadelphia Manager, LLC offers the following policies and procedures intended to prevent and raise awareness of compulsive and problem gambling.

It is the policy of all properties owned or operated by Isle of Capri inc. that any self-exclusion will be considered company-wide. Additionally, any such exclusion will be considered a life time ban. The following applies to persons who have placed themselves on the PGCB self-exclusion list only. All non-Pennsylvania exclusions will be properly trespassed and escorted from the casino. Procedures are in accordance with the policy titled *Procedures to prevent self-excluded persons from gambling*.

Procedures to prevent cashing of certain checks for patrons.

1. Isle Philadelphia Manager, LLC cashes personal checks for gaming purposes.
2. Personal checks will not be cashed at any location other than the Casino Cage. Cashiers and Cage Management will only cash personal checks in accordance with the procedures outlined in Section XXX of Isle Philadelphia Manager, LLC's approved Accounting and Internal Controls and as set forth in the policy titled *Procedures to prevent underage gambling*, policy titled *Procedures to prevent excluded persons from gambling* and policy titled *Procedures to prevent self-excluded persons from gambling*.
3. Isle Philadelphia Manager, LLC will not cash third party checks, checks from any government agency issued for any purpose, or paychecks.

Procedures Relating to Promotions and Promotions Advertising

Isle Philadelphia Manager, LLC intends to use marketing promotions as part of its overall marketing strategy. Any person wishing to take part in any promotion must be a valid player club card holder and can not be on either the self exclusion list or the exclusion list. The Isle Philadelphia Manager, LLC will take the following steps prior to conducting any promotion:

Promotions

1. Post the Rules for the Promotion at the Player's Club for public view which includes:
 - a. A description of what is being offered as part of the promotion
 - b. The date(s) and time(s) of the promotion
 - c. Eligibility requirements to participate in the promotion
 - d. What must be done to receive the promotion offer
 - e. The procedure to claim or redeem the promotion offer
 - f. The tagline "***Gambling Problem? Call 1-800-GAMBLER***" on all printed materials
2. Marketing personnel will review the valid identification of any person who wishes to take part in any promotion to ensure that they are at least 21 years of age. In addition, all persons who wish to take part in any promotion are checked against the player tracking system to ensure that they are not on the self-exclusion/excluded persons list. All records generated from any promotion will be retained by Isle Philadelphia Manager, LLC for a minimum of 5 years.
3. Isle Philadelphia Manager, LLC may conduct a promotion that is limited to invited patron only. In the event that rules of a promotion are printed on any invitation that the invited guest would be required to present

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upon arrival at the facility, Isle Philadelphia Manager, LLC will not post the rules of the promotion listed in #1 above.

Advertisement Requirements

Isle Philadelphia Manager, LLC will adhere to the following guidelines when conducting advertising of promotions:

1. A description of what is being offered as part of the promotion
2. The date(s) and time(s) of the promotion
3. Eligibility requirements to participate in the promotion
4. What must be done to receive the promotion offer
5. The procedure to claim or redeem the promotion offer
6. The tagline *"If you or someone you know has a gambling problem, help is available. Call toll free 1-800-GAMBLER" or "Gambling Problem? Call 1-800-GAMBLER"* on all printed materials

Required Notifications

At least two (2) business days prior to conducting a promotion, Isle Philadelphia Manager, LLC will provide the previously referenced rules of the promotion to:

1. The Casino Enforcement Office
2. The PGCB Office of Gaming Operations
3. The Department of Revenue

Prohibited Activities

Isle Philadelphia Manager, LLC will not conduct any promotion or publish any advertisement which:

1. Misrepresents the probability of winning the promotion or offer, or is false, misleading or deceptive
2. Is directed at or to minors
3. Promotes the consumption of alcohol while gaming
4. Violates any Federal, State or Local laws.

Isle Philadelphia Manager, LLC will immediately discontinue the use of any promotion or advertisement upon receipt of written notice from the Board to do so.

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Tower Entertainment, LLC
Primary Applicant/Licensee
Application and Disclosure Information Form

Update, February 11, 2013

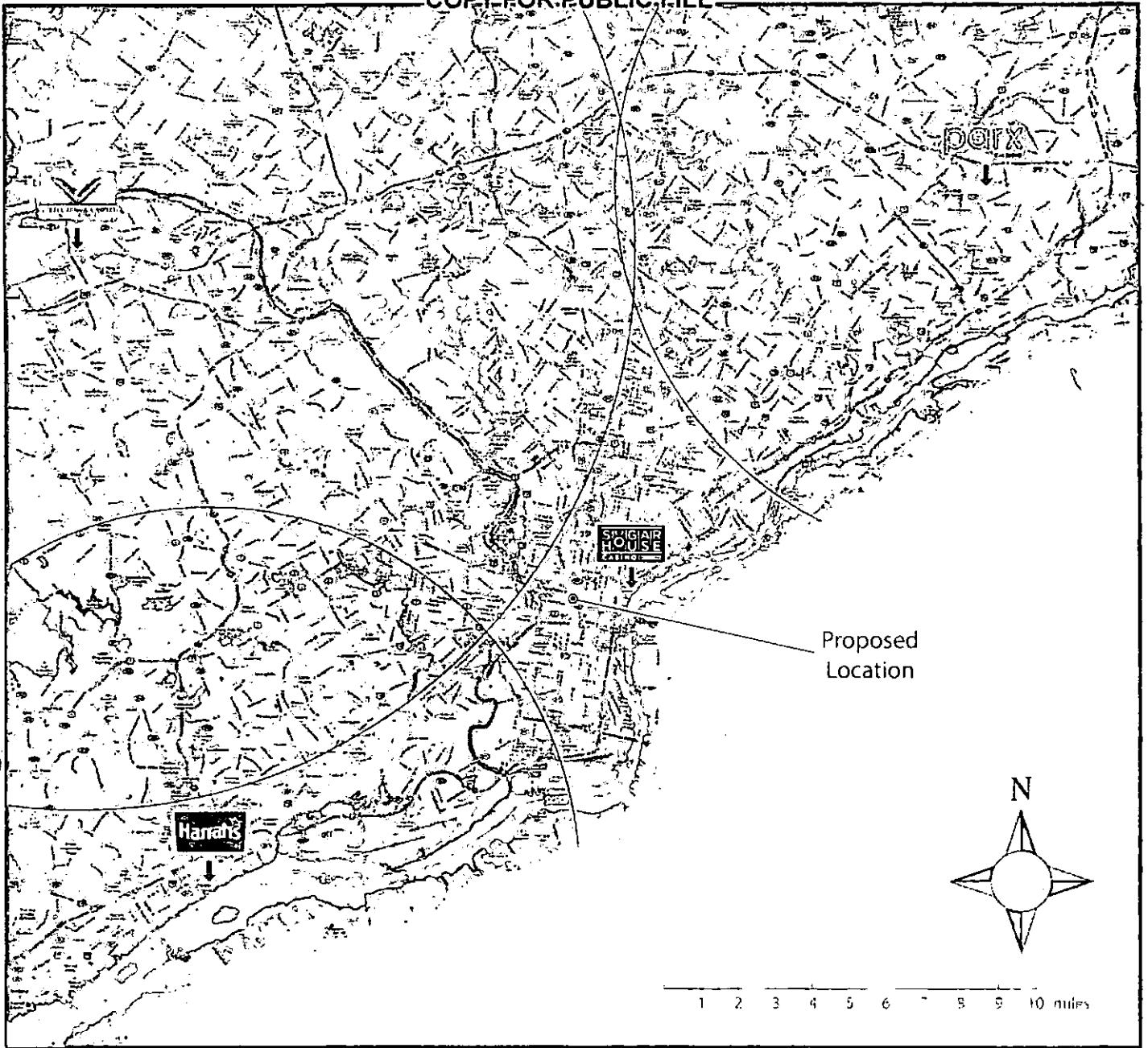
APPENDIX 38(1)

AS REQUIRED BY §1325 OF THE GAMING ACT, APPLICANT MUST ADDRESS EACH ITEM LISTED IN THIS SECTION. IF AN ITEM DOES NOT APPLY, THE APPLICANT MUST STATE THAT IN RESPONSE TO EACH ITEM LISTED, PROVIDE A PLAN, WITH DETAILS, FOR THE FOLLOWING:

(1) THE LOCATION AND QUALITY OF THE PROPOSED FACILITY, INCLUDING, BUT NOT LIMITED TO, ROAD AND TRANSIT ACCESS, PARKING AND CENTRALITY TO MARKET SERVICE AREA;

Please refer to Appendix 32 for the quality of the proposed facility and for parking plans; Appendix 34 for road and transit access; and Appendix 40 for the facility's centrality to its market service area. Further information is available from the Econsult Corporation's *The Potential Economic And Fiscal Impacts Of The Provence*, attached hereto at Appendix 38(2).

Please also see the attached map and linear distance report, which demonstrates that Tower Entertainment, LLC's proposed facility complies with the linear distance requirements in Section 1304(b)(1) of the Gaming Act.



Show on Map:

Facilities

- ☒ Parx Casino
- ☒ Harrah's Casino
- ☒ SugarHouse Casino
- ☒ Valley Forge Casino Resort

Protected Zone

- ☒ Outline
- ☒ Shaded Area

City of Philadelphia

- ☐ Outline
- ☒ Shaded Area

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Linear Distance Report

Tower Entertainment, LLC's ("Tower") proposed mixed-use entertainment facility at 400 North Broad Street, Philadelphia, PA 19130, will be well in excess of the minimum statutory distances away from other licensed facilities in southeast Philadelphia. The attached map visually demonstrates the scope of the statutory exclusion zones around each facility. 400 North Broad Street marked in the middle of the map is clearly well outside of those exclusion zones.

In addition, this report documents the direct linear distance between Tower's proposed mixed-use entertainment facility at 400 North Broad Street and the other licensed facilities in southeast Philadelphia by using GPS Visualizer, an on-line Global Positioning System ("GPS") software available at <http://www.gpsvisualizer.com/calculators>.

The addresses used for each facility, the minimum statutory distances, and the corresponding linear distances from Tower are as follows:

1) Harrah's - Minimum statutory distance: 10 miles.

Address: 777 Harrah's Boulevard
Chester, PA 19013

Distance to Tower based on Addresses: 12.418 miles

2) Parx Casino - Minimum statutory distance: 10 miles.

Address: 2999 Street Road
Bensalem, PA 19020

Distance to the Tower based on Addresses: 15.522 miles

3) Valley Forge Casino Resort - Minimum statutory distance: 15 miles.

Address: 1160 First Avenue
King of Prussia, PA 19406

Distance to Tower based on Addresses: 16.31 miles

4) Sugarhouse Casino - No minimum statutory distance.

Address: 1080 North Delaware Avenue
Philadelphia, PA 19125

Distance to Tower based on Addresses: 1.615 miles

The actual distance to the proposed site for the Category 3 licensed facility may be slightly greater than reported herein because the applicant used Tower's general address, 400 North Broad Street, Philadelphia, PA 19130, for this calculation. Nonetheless, Tower is clearly in compliance with the minimum statutory distances in the Gaming Act.